

**REDACTED – FOR PUBLIC INSPECTION**

**VIA ECFS**

June 22, 2016

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

RE: **REQUEST FOR CONFIDENTIAL TREATMENT**  
**WC Docket No. 14-58 - ETC Annual Reports and Certifications**

Request that Information Submitted to the Commission be Withheld from Public Inspection Pursuant to 47 C.F.R. §0.459 and 5 U.S.C. §552(b)(4): Five-Year Service Quality Improvement Plan Progress Report included in FCC Form 481

Confidential Information – Subject to Protective Order Before the Federal Communications Commission

Dear Ms. Dortch:

In accordance with the annual reporting requirements of 47 C.F.R. §§54.313 and 54.422, Panhandle Telephone Cooperative, Inc. (“PTCI” or “the Cooperative”), Study Area Code 432016, is submitting a completed FCC Form 481 to the Commission via its Electronic Comment Filing System (ECFS) in WC Docket No. 14-58. *The version of the Cooperative’s FCC Form 481 submitted via ECFS is a redacted version of the filing that contains no confidential information.*

The Cooperative, by its authorized representative, hereby requests confidential treatment of two attachments to its FCC Form 481: (1) the five-year service quality improvement plan progress report and (2) the financial annual report, both of which were redacted in the ECFS submission. The request for confidential treatment of the five-year plan progress report is being made pursuant to Section 0.459 of the Commission’s rules and Exemption 4 of the Freedom of Information Act (FOIA). The request for confidential treatment of the financial annual report is being made pursuant to the FCC’s

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Ms. Marlene Dortch

Page 2

March 22, 2016 *Protective Order* in WC Docket Nos. 10-90 and 14-58. These attachments contain competitively sensitive data that PTCI maintains as confidential and does not normally make available to the public. Release of this information would have a substantial negative impact on the Cooperative.

**Five-Year Service Quality Improvement Plan Progress Report**

Pursuant to Section 0.459 of the Commission's rules and Exemption 4 of FOIA, PTCI requests that the text and data extracted from its five-year service quality improvement plan progress report be withheld from public inspection because it contains competitively sensitive commercial and financial information that the Cooperative maintains as confidential. Public availability of this information would have a substantial negative impact on the Cooperative.

In accordance with Section 0.459 of the Commission's rules, the following information is provided in support of this request:

(1) Identification of the specific information for which confidential treatment is sought:

Attachment to Line 112 of FCC Form 481 – Five-Year Service Quality Improvement Plan Progress Report. Specifically, confidential treatment is sought for all information in the five-year plan progress report related to the Cooperative's access line counts, existing broadband capabilities, and current and planned financial investments in its network that will improve service quality, service coverage, and/or service capacity for its customers.

(2) Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission:

The information was submitted in WC Docket No. 14-58 as an attachment to FCC Form 481- the Carrier Annual Reporting Data Collection Form. Section 100 of FCC Form 481 requires incumbent local exchange carriers receiving high cost support to attach a progress report on its five-year service quality improvement plan, pursuant to 47 C.F.R. §54.313(a)(1).

(3) Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged:

The five-year service quality improvement plan progress report contains granular information on the Cooperative's access line counts and/or existing broadband capabilities as well as recent and planned capital investments in its network to improve service quality, service coverage, and/or service capacity. It also contains a

map of the Cooperative's service area detailing progress toward meeting broadband deployment targets at the wire center level. This is closely guarded, privileged information that the Cooperative does not make publicly available.

- (4) Explanation of the degree to which the information concerns a service that is subject to competition:

Broadband is subject to increasing competition in the areas served by rural, rate-of-return incumbent local exchange carriers (RLECs). Virtually all RLECs face competition from one or more wireless Internet service providers. Most RLECs also face competition from at least one other wireline broadband provider, such as a larger cable company, who will typically seek to "cherry pick" the lower cost portions of the study area. In addition, all RLECs face competition throughout their territories from satellite broadband providers.

- (5) Explanation of how disclosure of the information could result in substantial competitive harm:

Disclosure of the information contained in the five-year plan progress report would provide competitors with detailed, granular information regarding the Cooperative's access line count, its existing broadband capabilities, and its recent and planned network investments that improve service quality, coverage, and/or capacity for subscribers. This would give competitors valuable confidential information with which to develop their own strategies for investing in the service area, thereby bringing substantial competitive harm to the Cooperative.

- (6) Identification of any measures taken by the submitting party to prevent unauthorized disclosure:

The Cooperative has continually treated the extracted information in its five-year plan progress report as confidential and carefully controls the information to protect it from competitors. Access to the information is limited to employees that require it and to non-employees with confidentiality obligations such as lenders, consultants, auditors, and attorneys. In addition, when such information is required to be submitted to a state regulatory authority it has been filed as confidential information, not available to the public.

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Ms. Marlene Dortch

Page 4

- (7) Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties:

The redacted information in the five-year plan progress report is not available to the public, and third-party access is limited as described in (6) above.

- (8) Justification of the period during which the submitting party asserts that material should not be available for public disclosure:

The Cooperative requests that the extracted information be withheld from public inspection indefinitely. The information in the five-year plan progress report details the Cooperative's most recent network upgrades in relation to its previously submitted service quality improvement plan. It may also contain upcoming planned network improvements during the five-year period ending 2019. This information would provide a very useful baseline for competitors for several years beyond that period.

- (9) Any other information that the party seeking confidential information treatment believes may be useful in assessing whether its request for confidentiality should be granted:

Exemption 4 of FOIA shields from public disclosure commercial or financial information obtained from a person that is privileged or confidential. Based on the responses provided above, the information in question satisfies this test.

**Financial Annual Report**

Section 3005 of FCC Form 481 requires a privately-held rate-of-return carrier receiving high cost support to attach a full and complete annual report of the company's financial condition and operations pursuant to 47 C.F.R. §54.313(f)(2). PTCI seeks confidential treatment of its financial annual report pursuant to the March 22, 2016 *Protective Order* in WC Docket Nos. 10-90 and 14-58.<sup>1</sup> The *Protective Order* specifically covers information filed pursuant to 47 C.F.R. §54.313(f)(2).

PTCI is providing to the Office of the Secretary, under seal, this cover letter and the Form 481 filing which includes the confidential information that is being requested to be withheld from public inspection.

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<sup>1</sup> *Connect America Fund, ETC Annual Reports and Certifications*, WC Docket Nos. 10-90 and 14-58, Protective Order, DA 16-296 (rel. Mar. 22, 2016).

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Ms. Marlene Dortch

Page 5

Each page of the five-year service quality improvement plan progress report confidential submission bears the legend, "CONFIDENTIAL – NOT FOR PUBLIC DISCLOSURE."

Each page of the financial annual report confidential submission bears the legend, "CONFIDENTIAL INFORMATION – SUBJECT TO PROTECTIVE ORDER BEFORE THE FEDERAL COMMUNICATIONS COMMISSION."

The confidential information has also been submitted to the Universal Service Administrative Company through its E-File system as attachments to the FCC Form 481.

In the filing submitted via ECFS, all pages containing confidential information bear the legend "REDACTED – FOR PUBLIC INSPECTION."

This cover letter includes no confidential information and the text is the same in both the non-redacted and redacted versions except for the confidentiality markings.

Please contact me if you have any questions.

Sincerely,

A handwritten signature in dark ink, appearing to read "Stuart Polikoff". The signature is fluid and cursive, with the first name "Stuart" and last name "Polikoff" clearly distinguishable.

Stuart Polikoff  
Authorized Representative for  
Panhandle Telephone Cooperative, Inc.

SEP/pjf

Enclosures

cc: Ms. Kelley Wells, Panhandle Telephone Cooperative, Inc.

**FCC Form 481 - Carrier Annual Reporting  
Data Collection Form**FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	432016
<015>	Study Area Name	PANHANDLE TEL. COOP. INC.
<020>	Program Year	2017
<030>	Contact Name: Person USAC should contact with questions about this data	Kelley Wells
<035>	Contact Telephone Number: Number of the person identified in data line <030>	5804682179 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	kelley.wells@ptci.net
	Form Type	54.313 and 54.422

**(100) Service Quality Improvement Reporting  
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	432016
<015>	Study Area Name	PANHANDLE TEL. COOP. INC.
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Kelley Wells
<035>	Contact Telephone Number - Number of person identified in data line <030>	5804682179 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	kelley.wells@ptci.net

<110>	Has your company received its ETC certification from the FCC?	(yes / no )	<input type="radio"/> <input checked="" type="radio"/>
<111>	If your answer to Line <110> is yes, do you have an existing § 54.202(a) "5 year plan" filed with the FCC?	(yes / no )	<input type="radio"/> <input type="radio"/>

If your answer to Line <111> is yes, please file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

432016ok112.pdf

Name of Attached Document

Please select the appropriate responses below (Yes, No, Not Applicable) to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

- <113> Maps detailing progress towards meeting plan targets
- <114> Report how much universal service (USF) support was received
- <115> How much (USF) was used to improve service quality and how support was used to improve service quality
- <116> How much (USF) was used to improve service coverage and how support was used to improve service coverage
- <117> How much (USF) was used to improve service capacity and how support was used to improve service capacity
- <118> Provide an explanation of network improvement targets not met in the prior calendar year.

Yes
Yes
Yes
Yes
Yes
Not Applicable

<010>	Study Area Code	432016
<015>	Study Area Name	PANHANDLE TEL. COOP. :
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Kelley Wells
<035>	Contact Telephone Number - Number of person identified in data line <030>	5804682179 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	kelley.wells@ptci.net

No



**(300) Unfulfilled Service Request  
Data Collection Form**

 FCC Form 481  
 OMB Control No. 3060-0986/OMB Control No. 3060-0819  
 July 2013

<010>	Study Area Code	432016
<015>	Study Area Name	PANHANDLE TEL. COOP. INC.
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Kelley Wells
<035>	Contact Telephone Number - Number of person identified in data line <030>	5804682179 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	kelly.wells@ptci.net

&lt;300&gt; Unfulfilled service request (voice)

0

&lt;310&gt; Detail on attempts (voice)

Name of Attached Document

&lt;320&gt; Unfulfilled service request (broadband)

0

&lt;330&gt; Detail on attempts (broadband)

Name of Attached Document

<010>	Study Area Code	432016
<015>	Study Area Name	PANHANDLE TEL. COOP. INC.
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Kelley Wells
<035>	Contact Telephone Number - Number of person identified in data line <030>	5804682179 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	kelley.wells@ptci.net
<400>	Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed voice	
<410>	Complaints per 1000 customers for fixed voice	0 . 0
<420>	Complaints per 1000 customers for mobile voice	
<430>	Select from the drop-down list to indicate how you would like to report end-user customer complaints (zero or greater) for broadband service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed broadband	
<440>	Complaints per 1000 customers for fixed broadband	0 . 0
<450>	Complaints per 1000 customers for mobile broadband	

<010>	Study Area Code	432016
<015>	Study Area Name	PANHANDLE TEL. COOP. INC.
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Kelley Wells
<035>	Contact Telephone Number - Number of person identified in data line <030>	5804682179 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	kelley.wells@ptci.net
<500>	Certify compliance with applicable service quality standards and consumer protection rules	Yes
432016ok510.pdf		
<510>	Descriptive document for Service Quality Standards & Consumer Protection Rules Compliance	

<b>(600) Functionality in Emergency Situations</b>		FCC Form 481
<b>Data Collection Form</b>		OMB Control No. 3060-0986/OMB Control No. 3060-0819
		July 2013

<010>	Study Area Code	432016
<015>	Study Area Name	PANHANDLE TEL. COOP. INC.
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Kelley Wells
<035>	Contact Telephone Number - Number of person identified in data line <030>	5804682179 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	kelley.wells@ptci.net
<600>	Certify compliance regarding ability to function in emergency situations	Yes
<610>	Descriptive document for Functionality in Emergency Situations	432016ok610.pdf

<010>	Study Area Code	432016
<015>	Study Area Name	PANHANDLE TEL. COOP. INC.
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Kelley Wells
<035>	Contact Telephone Number - Number of person identified in data line <030>	5804682179 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	kelley.wells@ptci.net

<701>	Residential Local Service Charge Effective Date	1/1/2016
<702>	Single State-wide Residential Local Service Charge	17.5

[illegible]

<010>	Study Area Code	432016
<015>	Study Area Name	PANHANDLE TEL. COOP. INC.
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Kelley Wells
<035>	Contact Telephone Number - Number of person identified in data line <030>	5804682179 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	kelley.wells@ptci.net

-- See attached worksheet --

**(800) Operating Companies  
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	432016
<015>	Study Area Name	PANHANDLE TEL. COOP. INC.
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Kelley Wells
<035>	Contact Telephone Number - Number of person identified in data line <030>	5804682179 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	kelly.wells@ptci.net
<810>	Reporting Carrier	Panhandle Telephone Cooperative, Inc.
<811>	Holding Company	Panhandle Telephone Cooperative, Inc.
<812>	Operating Company	Panhandle Telephone Cooperative, Inc.

[illegible]

**(900) Tribal Lands Reporting  
Data Collection Form**

 FCC Form 481  
 OMB Control No. 3060-0986/OMB Control No. 3060-0819  
 July 2013

<010> Study Area Code	432016
<015> Study Area Name	PANHANDLE TEL. COOP. INC.
<020> Program Year	2017
<030> Contact Name - Person USAC should contact regarding this data	Kelley Wells
<035> Contact Telephone Number - Number of person identified in data line <030>	5804682179 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	kelley.wells@ptci.net
<900> Does the filing entity offer tribal land services? (Y/N)	Yes

&lt;910&gt; Tribal Land(s) on which ETC Serves

The service area of Panhandle Telephone Cooperative, Inc. ("the Cooperative") includes "former reservations" in Oklahoma. The Cooperative has not been able to clearly identify the tribes associated with the former tribal land served.

&lt;920&gt; Tribal Government Engagement Obligation

432016ok920.pdf

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

<921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.	Not Applicable
<922> Feasibility and sustainability planning;	Not Applicable
<923> Marketing services in a culturally sensitive manner;	Not Applicable
<924> Compliance with Rights of way processes	Not Applicable
<925> Compliance with Land Use permitting requirements	Not Applicable
<926> Compliance with Facilities Siting rules	Not Applicable
<927> Compliance with Environmental Review processes	Not Applicable
<928> Compliance with Cultural Preservation review processes	Not Applicable
<929> Compliance with Tribal Business and Licensing requirements.	Not Applicable

Select Yes or No or Not Applicable
Not Applicable
Not Applicable
Not Applicable
Not Applicable
Not Applicable
Not Applicable
Not Applicable
Not Applicable
Not Applicable



**(1000) Voice and Broadband Service Rate Comparability  
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	432016
<015>	Study Area Name	PANHANDLE TEL. COOP. INC.
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<039>	Contact Email Address - Email Address of person identified in data line <030>	kelly.wells@ptci.net

<1000> Voice services rate comparability certification Yes

<1010> Attach detailed description for voice services rate comparability compliance 432016ok1010.pdf

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Name of Attached Document

<1020> Broadband comparability certification Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau

<1030> Attach detailed description for broadband comparability compliance 432016ok1030.pdf

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Name of Attached Document

**(1100) No Terrestrial Backhaul Reporting  
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	432016
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<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Kelley Wells
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<039>	Contact Email Address - Email Address of person identified in data line <030>	kelley.wells@ptci.net

&lt;1100&gt; Certify whether terrestrial backhaul options exist (Y/N)

Yes

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

**(1200) Terms and Condition for Lifeline Customers**  
**Lifeline**  
**Data Collection Form**

FCC Form 481  
 OMB Control No. 3060-0986/OMB Control No. 3060-0819  
 July 2013

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<030>	Contact Name - Person USAC should contact regarding this data	Kelley Wells
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<039>	Contact Email Address - Email Address of person identified in data line <030>	kelley.wells@ptci.net

432016ok1210.pdf

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- |        |   |                                     |
|--------|---|-------------------------------------|
| <1221> | Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, | <input checked="" type="checkbox"/> |
| <1222> | Details on the number of minutes provided as part of the plan,  | <input checked="" type="checkbox"/> |
| <1223> | Additional charges for toll calls, and rates for each such plan.  | <input checked="" type="checkbox"/> |

**(2000) Price Cap Carrier Additional Documentation**

FCC Form 481

**Data Collection Form**

OMB Control No. 3060-0986/OMB Control No. 3060-0819

*Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers*

July 2013

<010>	Study Area Code	432016
<015>	Study Area Name	PANHANDLE TEL. COOP. INC.
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Kelley Wells
<035>	Contact Telephone Number - Number of person identified in data line <030>	5804682179 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	kelly.wells@ptci.net

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

**Incremental Connect America Phase I reporting**

- <2010> 2nd Year Certification 47 CFR § 54.313(b)(1)(i) - Note that for the July 1 2016 certification, this applies to Round 2 recipients of Incremental Support
- <2011> 3rd Year Certification 47 CFR § 54.313(b)(1)(ii) - Note that for the July 1 2016 certification, this applies to Round 1 recipients of Incremental Support
- <2022> Recipient certifies, representing year two after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbps/1Mbps - 54.313(b)(2)(i). Round 2 recipients only.
- <2023> The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating where funding was spent. This covers year two - 54.313(b)(2)(ii). Round 2 recipients only.
- <2024A> Round 2 Recipient of Incremental Support?
- <2024B> Attach list of census blocks indicating where funding was spent in year two - 54.313(b)(2)(ii). Round 2 recipients only.
- <2025A> Round 1 or Round 2 Recipient of Incremental Support?
- <2025B> Attach geocoded Information for Phase I milestone reports (Round 1 for year three and Round 2 for year two) - Connect America Fund , WC Docket 10-90, Report and Order, FCC 13-
- <2015> 2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)

Name of Attached Document Listing  
Required Information

Name of Attached Document Listing  
Required Information

**(2000) Price Cap Carrier Additional Documentation (Continued)**

FCC Form 481

**Data Collection Form**

OMB Control No. 3060-0986/OMB Control No. 3060-0819

*Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers*

July 2013

**Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}**

&lt;2016&gt; Certification support used to build broadband

**Connect America Phase II Reporting {47 CFR § 54.313(e)}**

&lt;2017A&gt; Connect America Fund Phase II recipient?

&lt;2017B&gt; Attach information for Phase II - 54.313(e)(1) - list of geocoded locations already meeting the 54.309 public interest obligations at the end of calendar year 2015 and total amount of Phase II support, if any, the price

Name of Attached Document Listing  
Required Information

cap carrier used for capital expenditures in 2015.

&lt;2018&gt; Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(2)(ii)

Name of Attached Document Listing  
Required Information

&lt;2019&gt; Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(2)(v)

&lt;2020&gt; Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 40% of its supported locations in the state on December 31, 2017 - 54.313(e)(3)

&lt;2021&gt; Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 60% of its supported locations in the state on December 31, 2018 - 54.313(e)(4)

&lt;2026&gt; Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 80% of its supported locations in the state on December 31, 2019 - 54.313(e)(5)

&lt;2027&gt; Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 100% of its supported locations in the state on December 31, 2020 - 54.313(e)(6)

<010>	Study Area Code	432016
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<039>	Contact Email Address - Email Address of person identified in data line <030>	kelley.wells@ptci.net

Complete the items below to note compliance with five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3009)	Progress Report on 5 Year Plan Carrier certifies to 54.313(f)(1)(iii)		
(3010A)	Milestone Certification {47 CFR § 54.313(f)(1)(i)}	Yes - Attach Certification	
(3010B)	Please Provide Attachment	Name of Attached Document Listing Required Information	432016ok3010.pdf
(3012A)	Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)}	No - No New Community Anchors	
(3012B)	Please Provide Attachment	Name of Attached Document Listing Required Information	
(3013)	Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)}	(Yes/No)	<input checked="" type="radio"/> <input type="radio"/>
(3014)	If yes, does your company file the RUS annual report	(Yes/No)	<input checked="" type="radio"/> <input type="radio"/>
(3015)	Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires: Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)		<input checked="" type="checkbox"/>
(3016)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows		<input checked="" type="checkbox"/>
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	Name of Attached Document Listing Required Information	432016ok3017.pdf
(3018)	If the response is no on line 3014, is your company audited?	(Yes/No)	<input type="radio"/> <input type="radio"/>
(3019)	If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains: Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers		<input type="checkbox"/>
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3021)	Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit.		<input type="checkbox"/>
(3022)	If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains: Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers		<input type="checkbox"/>
(3023)	Underlying information subjected to a review by an independent certified public accountant		<input type="checkbox"/>
(3024)	Underlying information subjected to an officer certification.		<input type="checkbox"/>
(3025)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3026)	Attach the worksheet listing required information	Name of Attached Document Listing Required Information	

**(3005) Rate Of Return Carrier Additional Documentation (Continued)**

FCC Form 481

**Data Collection Form**

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	432016
<015>	Study Area Name	PANHANDLE TEL. COOP. INC.
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Kelley Wells
<035>	Contact Telephone Number - Number of person identified in data line <030>	5804682179 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	kelly.wells@ptci.net

**Financial Data Summary**

(3027) Revenue

(3028) Operating Expenses

(3029) Net Income

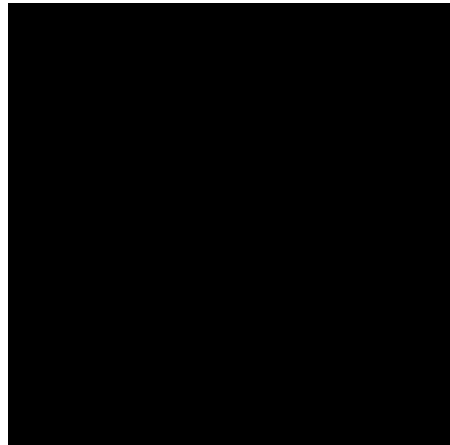
(3030) Telephone Plant In Service(TPIS)

(3031) Total Assets

(3032) Total Debt

(3033) Total Equity

(3034) Dividends



<010>	Study Area Code	432016
<015>	Study Area Name	PANHANDLE TEL. COOP. INC.
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Kelley Wells
<035>	Contact Telephone Number - Number of person identified in data line <030>	5804682179 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	kelley.wells@ptci.net

4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission’s public interest obligations. All RBE participants must provide a response to Line 4001.

**4001.** Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

Community Anchor Institutions – FCC 14-98 (paragraph 79)

**4003a.** RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

If yes to 4003A, please provide a response for 4003B.

4003b. Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year.

Name of Attached Document Listing Required Information

Broadband Deployment Locations – FCC 14-98 (paragraph 80)

4004a. Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing deadline for the FCC Form 481.

Name of Attached Document Listing Required Information

4004b. Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband speed and data usage allowances available in the relevant geographic area.

Name of Attached Document Listing Required Information



**Certification - Reporting Carrier  
Data Collection Form**

 FCC Form 481  
 OMB Control No. 3060-0986/OMB Control No. 3060-0819  
 July 2013

<010>	Study Area Code	432016
<015>	Study Area Name	PANHANDLE TEL. COOP. INC.
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Kelley Wells
<035>	Contact Telephone Number - Number of person identified in data line <030>	5804682179 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	kelley.wells@ptci.net

**TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:**

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

<b>Certification - Agent / Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010> Study Area Code	432016
<015> Study Area Name	PANHANDLE TEL. COOP. INC.
<020> Program Year	2017
<030> Contact Name - Person USAC should contact regarding this data	Kelley Wells
<035> Contact Telephone Number - Number of person identified in data line <030>	5804682179 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	kelley.wells@ptci.net

**TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:**

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) <u>Moss Adams LLP</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	<u>Moss Adams LLP</u>
Name of Reporting Carrier:	<u>PANHANDLE TEL. COOP. INC.</u>
Signature of Authorized Officer:	<u>CERTIFIED ONLINE</u> Date: <u>06/22/2016</u>
Printed name of Authorized Officer:	<u>Shawn Hanson</u>
Title or position of Authorized Officer:	<u>CEO</u>
Telephone number of Authorized Officer:	<u>5804682180 ext.</u>
Study Area Code of Reporting Carrier:	<u>432016</u> Filing Due Date for this form: <u>07/01/2016</u>
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

**TO BE COMPLETED BY THE AUTHORIZED AGENT:**

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	<u>PANHANDLE TEL. COOP. INC.</u>
Name of Authorized Agent Firm:	<u>Moss Adams LLP</u>
Signature of Authorized Agent or Employee of Agent:	<u>CERTIFIED ONLINE</u> Date: <u>06/22/2016</u>
Name of Authorized Agent Employee:	<u>Stuart Polikoff</u>
Title or position of Authorized Agent or Employee of Agent	<u>Consulting Senior Manager</u>
Telephone number of Authorized Agent or Employee of Agent:	<u>5126527730 ext.</u>
Study Area Code of Reporting Carrier:	<u>432016</u> Filing Due Date for this form: <u>07/01/2016</u>
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

## Attachments

<b>(700) Price Offerings including Voice Rate Data</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	432016
<015>	Study Area Name	PANHANDLE TEL. COOP. INC.
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Kelley Wells
<035>	Contact Telephone Number - Number of person identified in data line <030>	5804682179 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	kelley.wells@ptci.net

<701>	Residential Local Service Charge Effective Date	1/1/2016
<702>	Single State-wide Residential Local Service Charge	17.5

<703>

[illegible]

**(710) Broadband Price Offerings**  
**Data Collection Form**

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	432016
<015>	Study Area Name	PANHANDLE TEL. COOP. INC.
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Kelley Wells
<035>	Contact Telephone Number - Number of person identified in data line <030>	5804682179 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	kelley.wells@ptci.net

<711>	<a1>	<a2>	<b1>	<b2>	<c>	<d1>	<d2>	<d3>	<d4>
	State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rates and Fees	Broadband Service - Download Speed (Mbps)	Broadband Service - Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached {select}
	OK	ALL	59.99	0.0	59.99	12.0	1.0	999999	Other, No limit on usage allowance
	TX	Guymon	59.99	0.0	59.99	12.0	1.0	999999	Other, No limit on usage allowance
	TX	Hardesty	59.99	0.0	59.99	12.0	1.0	999999	Other, No limit on usage allowance
	TX	Texhoma	59.99	0.0	59.99	12.0	1.0	999999	Other, No limit on usage allowance
	OK	ALL	64.99	0.0	64.99	20.0	3.0	999999	Other, No limit on usage allowance
	TX	Guymon	64.99	0.0	64.99	20.0	3.0	999999	Other, No limit on usage allowance
	TX	Hardesty	64.99	0.0	64.99	20.0	3.0	999999	Other, No limit on usage allowance
	TX	Texhoma	64.99	0.0	64.99	20.0	3.0	999999	Other, No limit on usage allowance
	OK	ALL	79.99	0.0	79.99	30.0	5.0	999999	Other, No limit on usage allowance
	TX	Guymon	79.99	0.0	79.99	30.0	5.0	999999	Other, No limit on usage allowance
	TX	Hardesty	79.99	0.0	79.99	30.0	5.0	999999	Other, No limit on usage allowance
	TX	Texhoma	79.99	0.0	79.99	30.0	5.0	999999	Other, No limit on usage allowance
	OK	ALL	99.99	0.0	99.99	50.0	5.0	999999	Other, No limit on usage allowance
	TX	Guymon	99.99	0.0	99.99	50.0	5.0	999999	Other, No limit on usage allowance
	TX	Hardesty	99.99	0.0	99.99	50.0	5.0	999999	Other, No limit on usage allowance
	TX	Texhoma	99.99	0.0	99.99	50.0	5.0	999999	Other, No limit on usage allowance
	OK	ALL	139.99	0.0	139.99	100.0	10.0	999999	Other, No limit on usage allowance
	TX	Guymon	139.99	0.0	139.99	100.0	10.0	999999	Other, No limit on usage allowance
	TX	Hardesty	139.99	0.0	139.99	100.0	10.0	999999	Other, No limit on usage allowance
	TX	Texhoma	139.99	0.0	139.99	100.0	10.0	999999	Other, No limit on usage allowance
	OK	ALL	159.99	0.0	159.99	250.0	25.0	999999	Other, No limit on usage allowance

<b>(710) Broadband Price Offerings</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	432016
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<039>	Contact Email Address - Email Address of person identified in data line <030>	kelley.wells@ptci.net

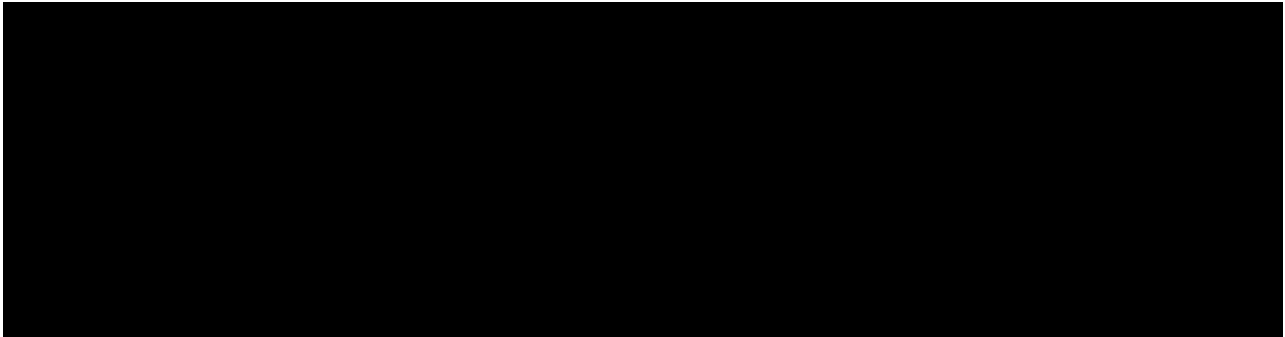
[illegible]

<b>(800) Operating Companies</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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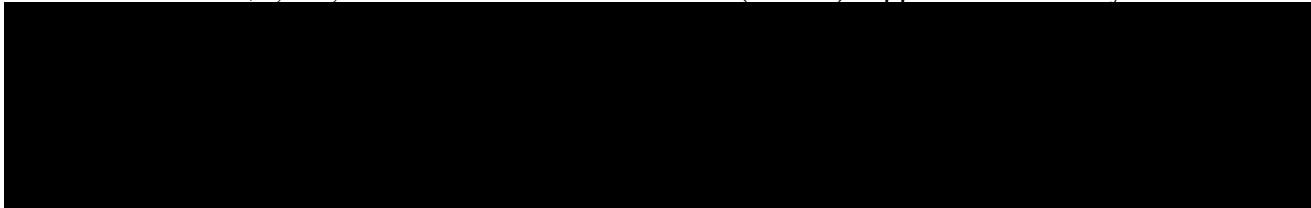
July 2013

[illegible]

**LINE 112 – FIVE-YEAR SERVICE QUALITY IMPROVEMENT PLAN  
PROGRESS REPORT**

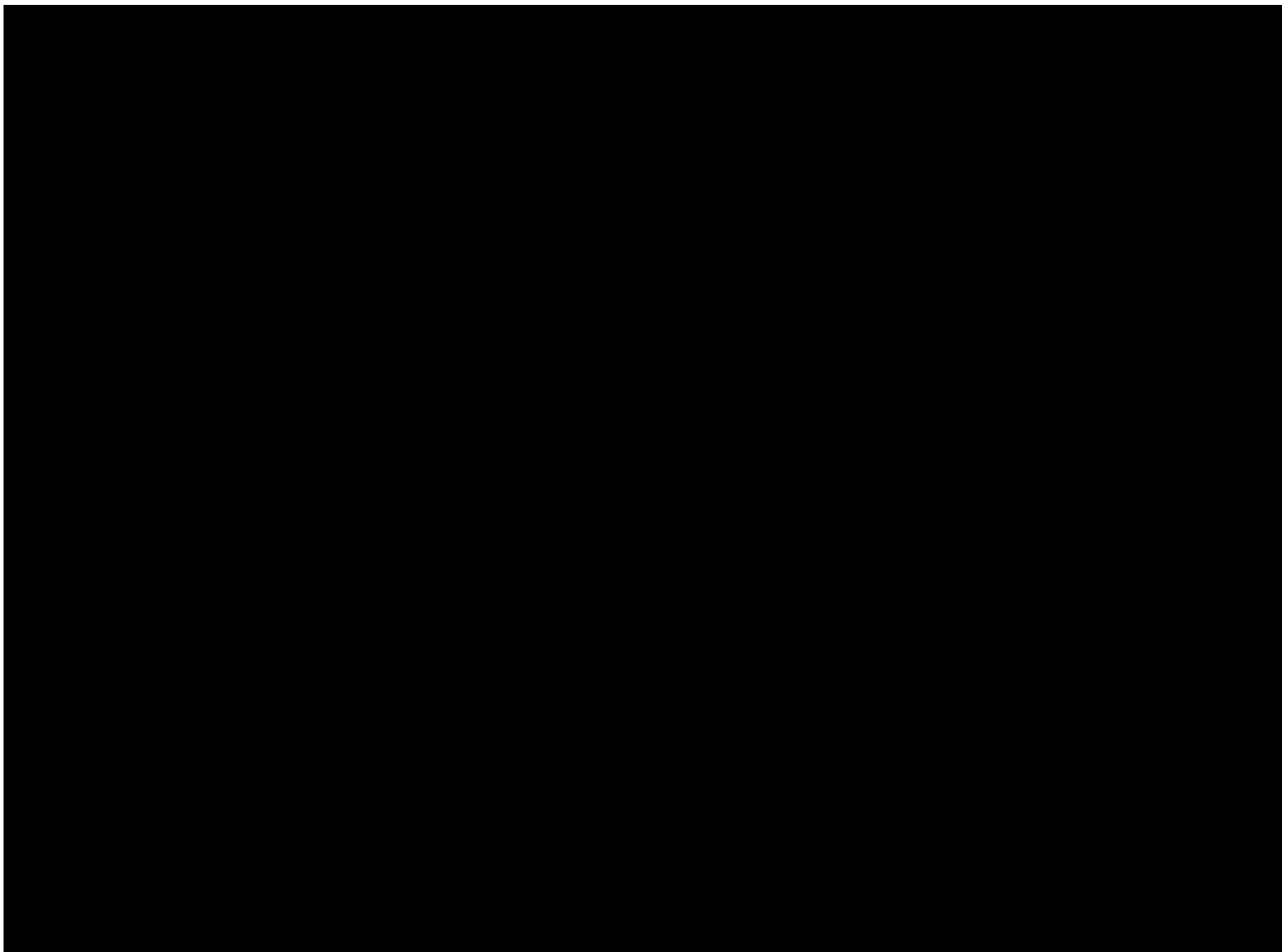


PTCI received \$9,536,640 in Universal Service Fund (“USF”) support in calendar year 2015.





**PTCI Exchange Map Showing Current Broadband Capabilities**



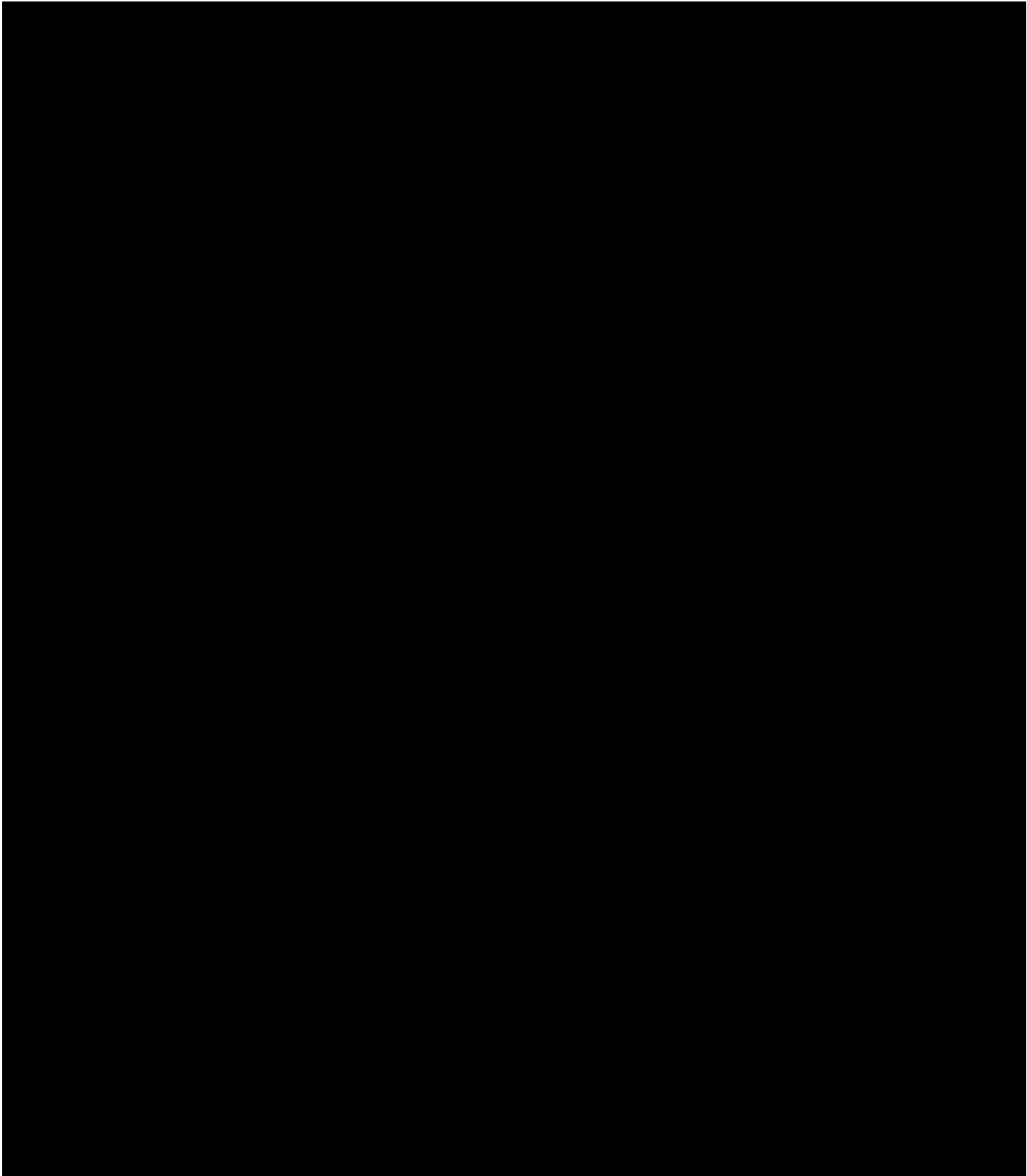
**Service Quality Improvement Plan Progress Report**

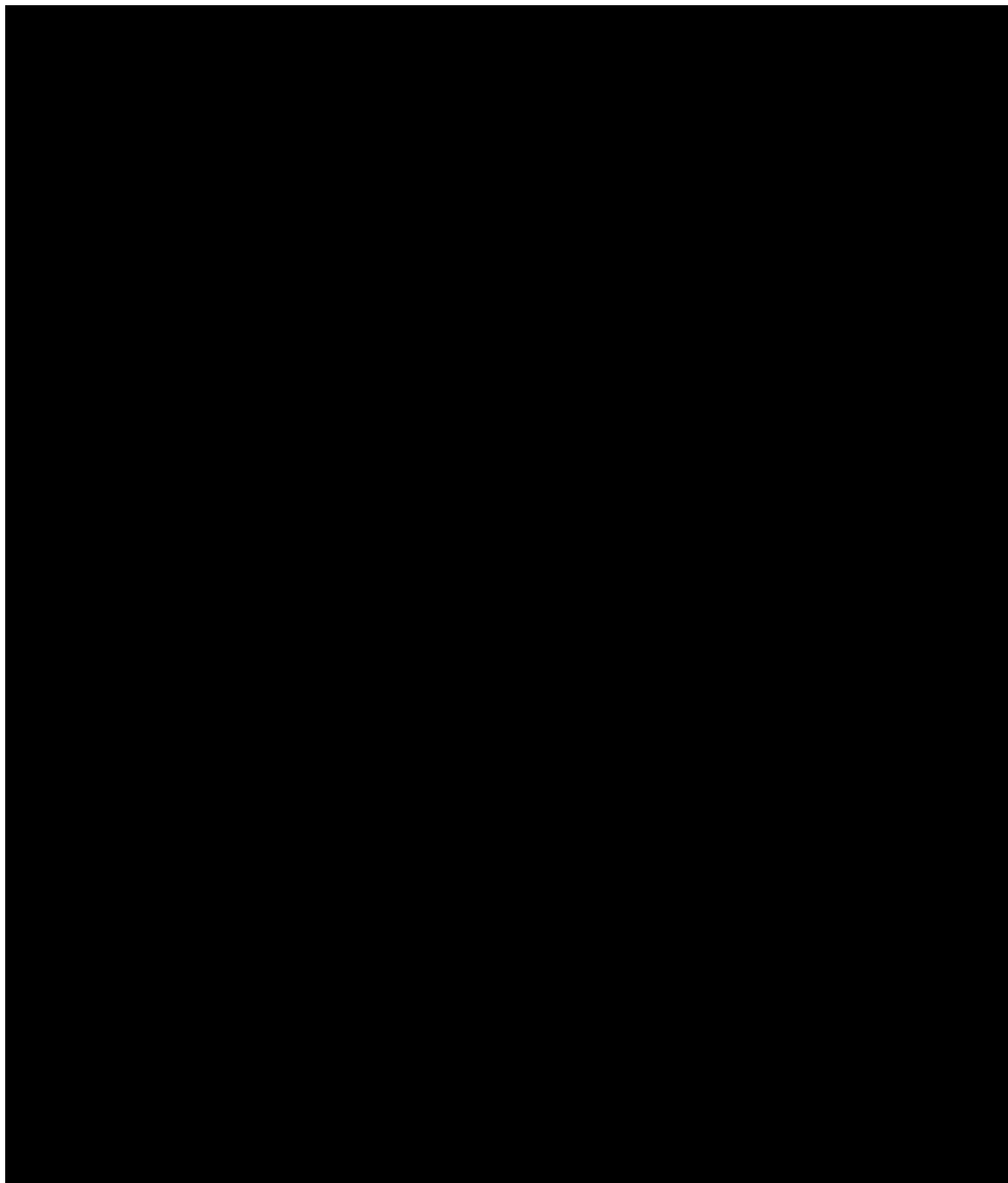
The table below shows PTCI’s actual network investments at the exchange level during calendar year 2015, compared with its original 2015 investment plans that were indicated in its five-year service quality improvement plan.

Exchange	Description of Improvements	2015 Planned	2015 Actual	Estimated Population Served by Improvements
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**Year End 2015 Progress Report Description**





## **LINE 510 - SERVICE QUALITY STANDARDS AND CONSUMER PROTECTION RULES COMPLIANCE**

Panhandle Telephone Cooperative, Inc. (“the Cooperative”) complies with applicable service quality standards and consumer protection rules for its voice and broadband services.

The rates, terms, and conditions under which the Cooperative operates are outlined in its member services tariff, which is approved by the Oklahoma Corporation Commission (“OCC”). The tariff contains provisions regarding the Cooperative’s customer service and protection practices.

Service quality standards for voice service are established by the OCC. The Cooperative consistently meets or exceeds those standards and provides reports to the OCC, in accordance with the OCC’s rules.

With regard to broadband service, the Cooperative provisions its network and equipment to ensure that its customers can enjoy the speeds to which they subscribe. However, Internet speeds generally result from a “best effort” service and are dependent upon a number of variables, many of which are outside the control of the Cooperative. The Cooperative also complies with the FCC’s Open Internet rules, 47 C.F.R. §§8.3-8.11. These rules prohibit blocking, throttling, and paid prioritization, and also require transparency of network management practices, performance, and the commercial terms of broadband services.

The Cooperative complies with any and all consumer protection obligations under state law.

The Cooperative also complies with the following consumer best practices: (1) the Cooperative discloses its rates and terms of service to customers; (2) the Cooperative provides specific disclosures in its advertising; (3) the Cooperative separately identifies carrier charges from taxes on its billing statements; (4) the Cooperative provides ready access to customer service; (5) the Cooperative promptly responds to consumer inquiries and complaints received from government agencies; and (6) the Cooperative abides by policies for protection of consumer privacy.

Finally, the Cooperative has a policy and established operating procedures that comply with the FCC’s Customer Proprietary Network Information (CPNI) rules (47 C.F.R. §§64.2001-64.2011). Certification of the Cooperative’s compliance with CPNI rules and a description of the Cooperative’s operating procedures that ensure compliance are filed annually with the FCC.

## **LINE 610 - ABILITY TO FUNCTION IN EMERGENCY SITUATIONS**

Panhandle Telephone Cooperative, Inc. (“the Cooperative”) is able to function in emergency situations for both voice and broadband service. The Cooperative has a reasonable amount of back-up power to ensure functionality without an external power source. Standby power generators are at the central offices, as well as strategic locations to be deployed as needed to ensure functionality without an external power source until power is restored. The network is capable of managing traffic spikes resulting from emergency situations.

The Cooperative is able to reroute traffic around damaged facilities. Although the Cooperative’s ability to reroute traffic around damaged facilities is not absolute and may be limited in certain circumstances, there is a restoration plan in place for expeditious recovery of service, including splicing of damaged facilities when warranted.

## **LINE 920 – TRIBAL GOVERNMENT ENGAGEMENT OBLIGATION**

The service area of Panhandle Telephone Cooperative, Inc. (“the Cooperative”) includes “former reservations” in Oklahoma. The Cooperative was unable to clearly identify the tribes associated with the former tribal land served and sent letters on November 10, 2015 “return receipt requested” to all of the tribes in Oklahoma as listed below. The letters were addressed to the contacts as provided by the National Congress of American Indian's Tribal directory. Each letter requested that the Tribal government representative contact the Cooperative to engage in discussions or acknowledge that they have no tribal interest in the Cooperative's service area and decline to engage in discussions. Following is the status of the attempted contacts.

Jicarilla Apache Nation - A signed receipt was received on November 16, 2015. By the end of 2015, the Cooperative had not been contacted by any representative of the Tribal government.

Comanche Nation – A signed receipt was received on November 16, 2015. By the end of 2015, the Cooperative had not been contacted by any representative of the Tribal government.

United Keetoowah Band of Cherokee Indians - A signed receipt was received on November 13, 2015. By the end of 2015, the Cooperative had not been contacted by any representative of the Tribal government.

Cheyenne and Arapaho Tribes - A signed receipt was received on November 17, 2015. By the end of 2015, the Cooperative had not been contacted by any representative of the Tribal government.

Kiowa Tribe of Oklahoma - A signed receipt was received on November 17, 2015. By the end of 2015, the Cooperative had not been contacted by any representative of the Tribal government.



## Panhandle Telephone Cooperative, Inc.

---

SHAWN HANSON  
Chief Executive Officer

November 10, 2015

Ty Vicenti  
President  
Jicarilla Apache Nation  
P. O. Box 507  
Dulce, NM 87528

Re: Federal Communications Commission mandate for Tribal Consultations

Dear President Vicenti:

As you may be aware, the FCC has issued a new rule requiring telecommunication service providers to engage with Tribal governments if the company provides service on Tribal lands. "Tribal lands" are defined as *"any federally recognized Indian Tribe's reservations, pueblo or colony, including former reservations in Oklahoma"*. On behalf of Panhandle Telephone Coop., Inc. we want to make sure that the communications needs of your Tribal members and all institutions operated by your Nation are met. In order to accomplish this, I would like to arrange a meeting with you or others you may designate to discuss needs and assessment and deployment planning for the communication needs of your Tribal members and Tribal government institutions. Panhandle Telephone Coop., Inc.'s service area consists of Cimarron, Texas and Beaver counties in the Oklahoma Panhandle, and a small portion of far eastern Union County, New Mexico. I am uncertain as to the Jicarilla Apache Nation's interest regarding our service area, and would like to confirm your desire to participate with us in this engagement process. To assist you in making this decision, I have attached a map of our service area. Should your area of interest include our service area, I would like to discuss, at a minimum, the following:

1. The communication needs of Tribal community anchor institutions
2. Feasibility and sustainability planning for your communication needs
3. Marketing of our services to Tribal members
4. Rights of way issues, if any, associated with our provisioning of services to Tribal members and/or institutions operated by the Nation
5. Our compliance with Tribal business and licensing requirements, if any
6. Other items you wish to discuss.

I would like to schedule a meeting at your earliest convenience. Please contact me at the below phone number or email address so we can select the time and location that best fits your schedule.



Alternatively, if you feel you have no Tribal interests in our service area, I've included a letter to that effect and a return envelope which you may use to communicate that decision to us. Or, if you prefer, you could choose to contact us via the contact information below:

Contact information:

Travis Clark

P. O. Box 1188

Guymon, OK 73942


Email: [travis.clark@ptci.net](mailto:travis.clark@ptci.net)

Phone: 580-468-2307

Mobile: 580-651-3880

Fax: 580-468-3799

Sincerely,

A handwritten signature in black ink that reads "Travis Clark". The signature is fluid and cursive, with the first name "Travis" being more prominent than the last name "Clark".

Travis Clark  
Plant Manager

TC:kb

cc: Shawn Hanson  
CEO  
Panhandle Telephone Coop., Inc.

Travis Clark  
Plant Manager  
PTCI/PTSI  
PO Box 1188  
Guymon, OK 73942

Dear Mr. Clark:

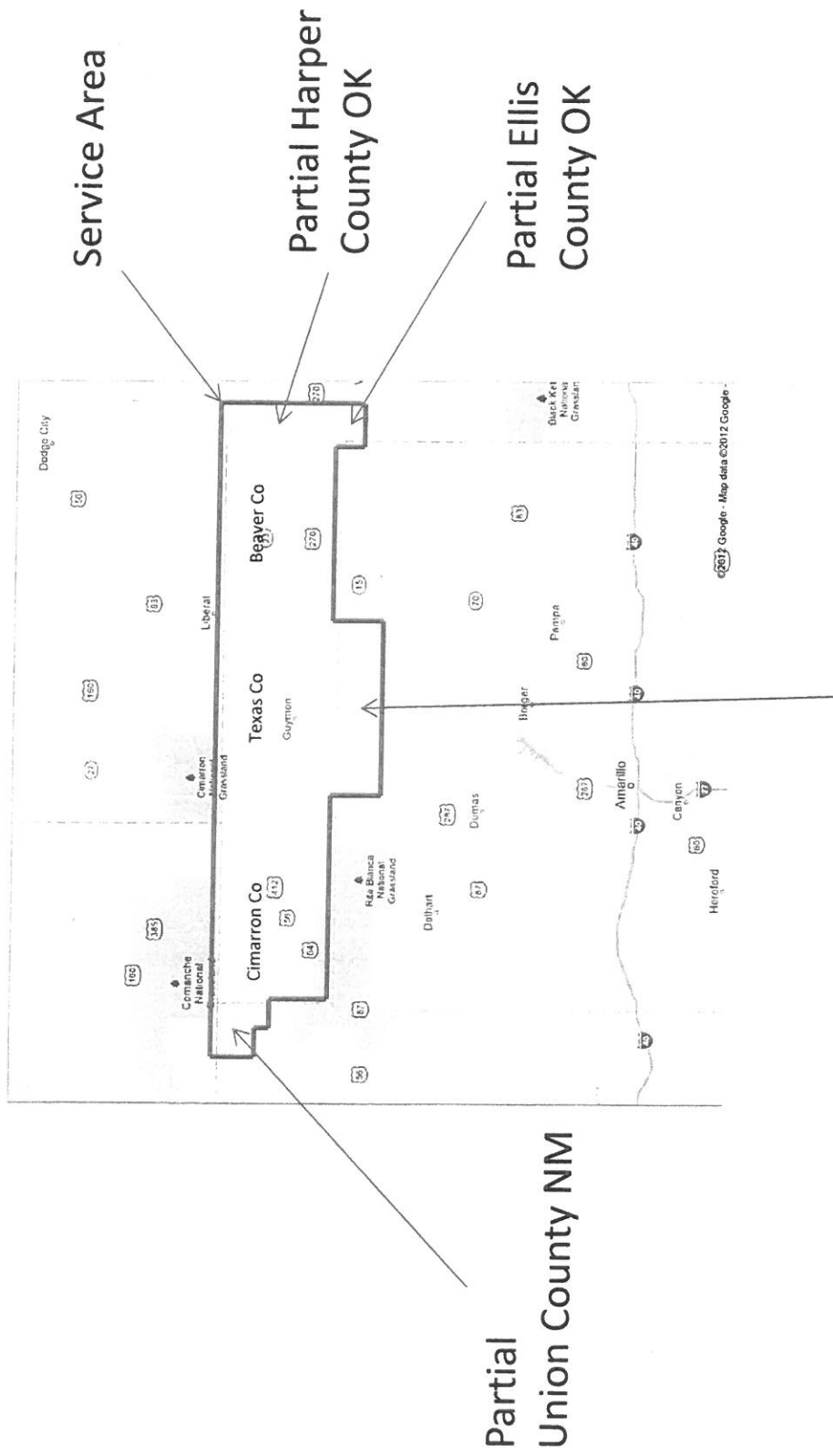
This document will serve to notify Panhandle Telephone Cooperative, Inc. that the Jicarilla Apache Nation has no Tribal interest in Panhandle's Service area and as such, decline to engage in a discussion of our Tribal communication needs.

Signature \_\_\_\_\_

Title \_\_\_\_\_

Date \_\_\_\_\_

Google





## Panhandle Telephone Cooperative, Inc.

---

SHAWN HANSON  
Chief Executive Officer

November 10, 2015

George Wickliffe  
Chief  
United Keetoowah Band of Cherokee Indians  
P. O. Box 746  
Tahlequah, OK 74465

Re: Federal Communications Commission mandate for Tribal Consultations

Dear Chief Wickliffe:

As you may be aware, the FCC has issued a new rule requiring telecommunication service providers to engage with Tribal governments if the company provides service on Tribal lands. "Tribal lands" are defined as *"any federally recognized Indian Tribe's reservations, pueblo or colony, including former reservations in Oklahoma"*. On behalf of Panhandle Telephone Coop., Inc., we want to make sure that the communications needs of your Tribal members and all institutions operated by your Nation are met. In order to accomplish this, I would like to arrange a meeting with you or others you may designate to discuss needs and assessment and deployment planning for the communication needs of your Tribal members and Tribal government institutions. Panhandle Telephone Coop., Inc.'s service area consists of Cimarron, Texas and Beaver counties in the Oklahoma Panhandle, and a small portion of western Harper and far northeast Ellis counties. I am uncertain as to the United Keetoowah Band's interest regarding our service area, and would like to confirm your desire to participate with us in this engagement process. To assist you in making this decision, I have attached a map of our service area. Should your area of interest include our service area, I would like to discuss, at a minimum, the following:

1. The communication needs of Tribal community anchor institutions
2. Feasibility and sustainability planning for your communication needs
3. Marketing of our services to Tribal members
4. Rights of way issues, if any, associated with our provisioning of services to Tribal members and/or institutions operated by the Nation
5. Our compliance with Tribal business and licensing requirements, if any
6. Other items you wish to discuss.

I would like to schedule a meeting at your earliest convenience. Please contact me at the below phone number or email address so we can select the time and location that best fits your schedule.

Alternatively, if you feel you have no Tribal interests in our service area, I've included a letter to that effect and a return envelope which you may use to communicate that decision to us. Or, if you prefer, you could choose to contact us via the contact information below:

Contact information:

Travis Clark

P. O. Box 1188

Guymon, OK 73942

Email: [travis.clark@ptci.net](mailto:travis.clark@ptci.net)

Phone: 580-468-2307

Mobile: 580-651-3880

Fax: 580-468-3799

Sincerely,

A handwritten signature in black ink that reads "Travis Clark". The signature is fluid and cursive, with the first name "Travis" being more prominent than the last name "Clark".

Travis Clark  
Plant Manager

TC:kb

cc: Shawn Hanson  
CEO  
Panhandle Telephone Coop., Inc.

Travis Clark  
Plant Manager  
PTCI/PTSI  
PO Box 1188  
Guymon, OK 73942

Dear Mr. Clark:

This document will serve to notify Panhandle Telephone Cooperative, Inc. that the United Keetoowah Band of Cherokee Indians have no Tribal interest in Panhandle's Service area and as such, decline to engage in a discussion of our Tribal communication needs.

Signature \_\_\_\_\_

Title \_\_\_\_\_

Date \_\_\_\_\_





## Panhandle Telephone Cooperative, Inc.

---

SHAWN HANSON  
Chief Executive Officer

November 10, 2015

Wallace Coffey  
Chairman  
Comanche Nation  
P. O. Box 908  
Lawton, OK 73502

Re: Federal Communications Commission mandate for Tribal Consultations

Dear Chairman Coffey:

As you may be aware, the FCC has issued a new rule requiring telecommunication service providers to engage with Tribal governments if the company provides service on Tribal lands. "Tribal lands" are defined as *"any federally recognized Indian Tribe's reservations, pueblo or colony, including former reservations in Oklahoma"*. On behalf of Panhandle Telephone Cooperative, Inc., we want to make sure that the communications needs of your Tribal members and all institutions operated by your Nation are met. In order to accomplish this, I would like to arrange a meeting with you or others you may designate to discuss needs and assessment and deployment planning for the communication needs of your Tribal members and Tribal government institutions. Panhandle Telephone Cooperative's service area consists of Cimarron, Texas and Beaver counties in the Oklahoma Panhandle, and a small portion of western Harper and far northeast Ellis counties. I am uncertain as to the Comanche Nation's interest regarding our service area, and would like to confirm your desire to participate with us in this engagement process. To assist you in making this decision, I have attached a map of our service area. Should your area of interest include our service area, I would like to discuss, at a minimum, the following:

1. The communication needs of Tribal community anchor institutions
2. Feasibility and sustainability planning for your communication needs
3. Marketing of our services to Tribal members
4. Rights of way issues, if any, associated with our provisioning of services to Tribal members and/or institutions operated by the Nation
5. Our compliance with Tribal business and licensing requirements, if any
6. Other items you wish to discuss.

I would like to schedule a meeting at your earliest convenience. Please contact me at the below phone number or email address so we can select the time and location that best fits your schedule.



Alternatively, if you feel you have no Tribal interests in our service area, I've included a letter to that effect and a return envelope which you may use to communicate that decision to us. Or, if you prefer, you could choose to contact us via the contact information below:

Contact information:

Travis Clark

P. O. Box 1188

Guymon, OK 73942

Email: [travis.clark@ptci.net](mailto:travis.clark@ptci.net)

Phone: 580-468-2307

Mobile: 580-651-3880

Fax: 580-468-3799

Sincerely,

A handwritten signature in black ink that reads "Travis Clark". The signature is fluid and cursive, with the first name "Travis" being more prominent than the last name "Clark".

Travis Clark  
Plant Manager

TC:kb

cc: Shawn Hanson  
CEO  
Panhandle Telephone Coop., Inc.

Travis Clark  
Plant Manager  
PTCI/PTSI  
PO Box 1188  
Guymon, OK 73942

Dear Mr. Clark:

This document will serve to notify Panhandle Telephone Cooperative, Inc. that the Comanche Nation has no Tribal interest in Panhandle's Service area and as such, decline to engage in a discussion of our Tribal communication needs.

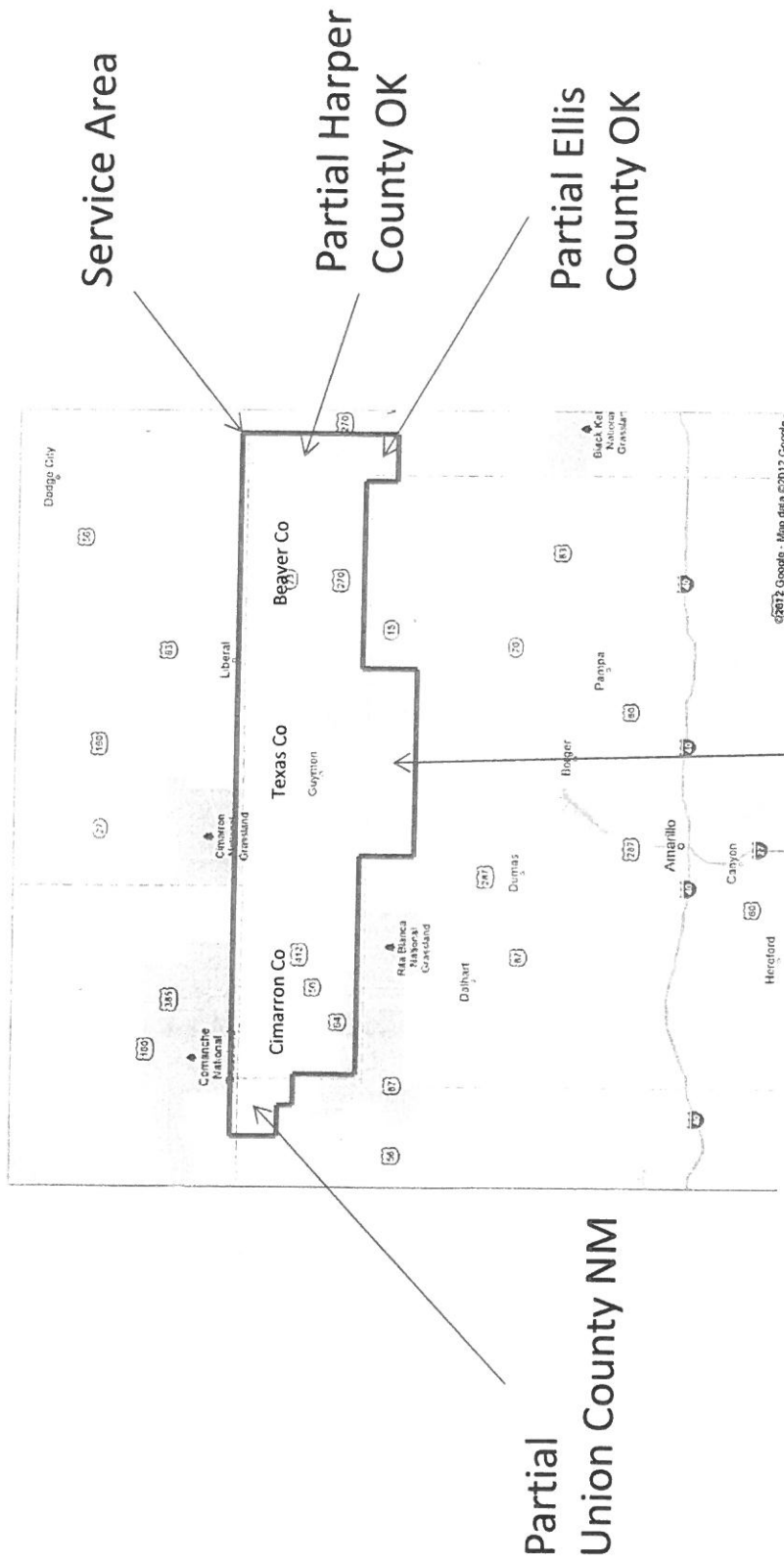
Signature \_\_\_\_\_

Title \_\_\_\_\_

Date \_\_\_\_\_

Google

Get Google Maps on your phone  
Text the word "GMAPS" to 466453



## Partial Sherman And Hansford Counties TX



## Panhandle Telephone Cooperative, Inc.

---

SHAWN HANSON  
Chief Executive Officer

November 10, 2015

Amber C. Toppah, Chairman  
Kiowa Tribe of Oklahoma  
PO Box 369  
Carnegie, OK 73105

Re: Federal Communications Commission mandate for Tribal Consultations

Dear Chairman Toppah:

As you may be aware, the FCC has issued a new rule requiring telecommunication service providers to engage with Tribal governments if the company provides service on Tribal lands. "Tribal lands" are defined as *"any federally recognized Indian Tribe's reservations, pueblo or colony, including former reservations in Oklahoma"*. On behalf of Panhandle Telephone Coop., Inc., we want to make sure that the communications needs of your Tribal members and all institutions operated by your Nation are met. In order to accomplish this, I would like to arrange a meeting with you or others you may designate to discuss needs and assessment and deployment planning for the communication needs of your Tribal members and Tribal government institutions. Panhandle Telephone Coop., Inc.'s service area consists of Cimarron, Texas and Beaver counties in the Oklahoma Panhandle, and a small portion of western Harper and far northeast Ellis counties. I am uncertain as to the Kiowa Tribe's interest regarding our service area, and would like to confirm your desire to participate with us in this engagement process. To assist you in making this decision, I have attached a map of our service area. Should your area of interest include our service area, I would like to discuss, at a minimum, the following:

1. The communication needs of Tribal community anchor institutions
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4. Rights of way issues, if any, associated with our provisioning of services to Tribal members and/or institutions operated by the Nation
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Contact information:

Travis Clark

P. O. Box 1188

Guymon, OK 73942

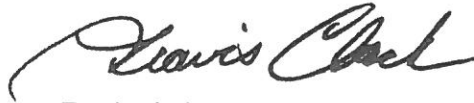
Email: [travis.clark@ptci.net](mailto:travis.clark@ptci.net)

Phone: 580-468-2307

Mobile: 580-651-3880

Fax: 580-468-3799

Sincerely,

A handwritten signature in black ink that reads "Travis Clark". The signature is fluid and cursive, with the first name "Travis" being more prominent than the last name "Clark".

Travis Clark  
Plant Manager

GB:kb

cc: Shawn Hanson  
CEO  
Panhandle Telephone Coop., Inc.

Travis Clark  
Plant Manager  
PTCI/PTSI  
PO Box 1188  
Guymon, OK 73942

Dear Mr. Clark:

This document will serve to notify Panhandle Telephone Cooperative, Inc. that the Kiowa Tribe has no Tribal interest in Panhandle's Service area and as such, decline to engage in a discussion of our Tribal communication needs.

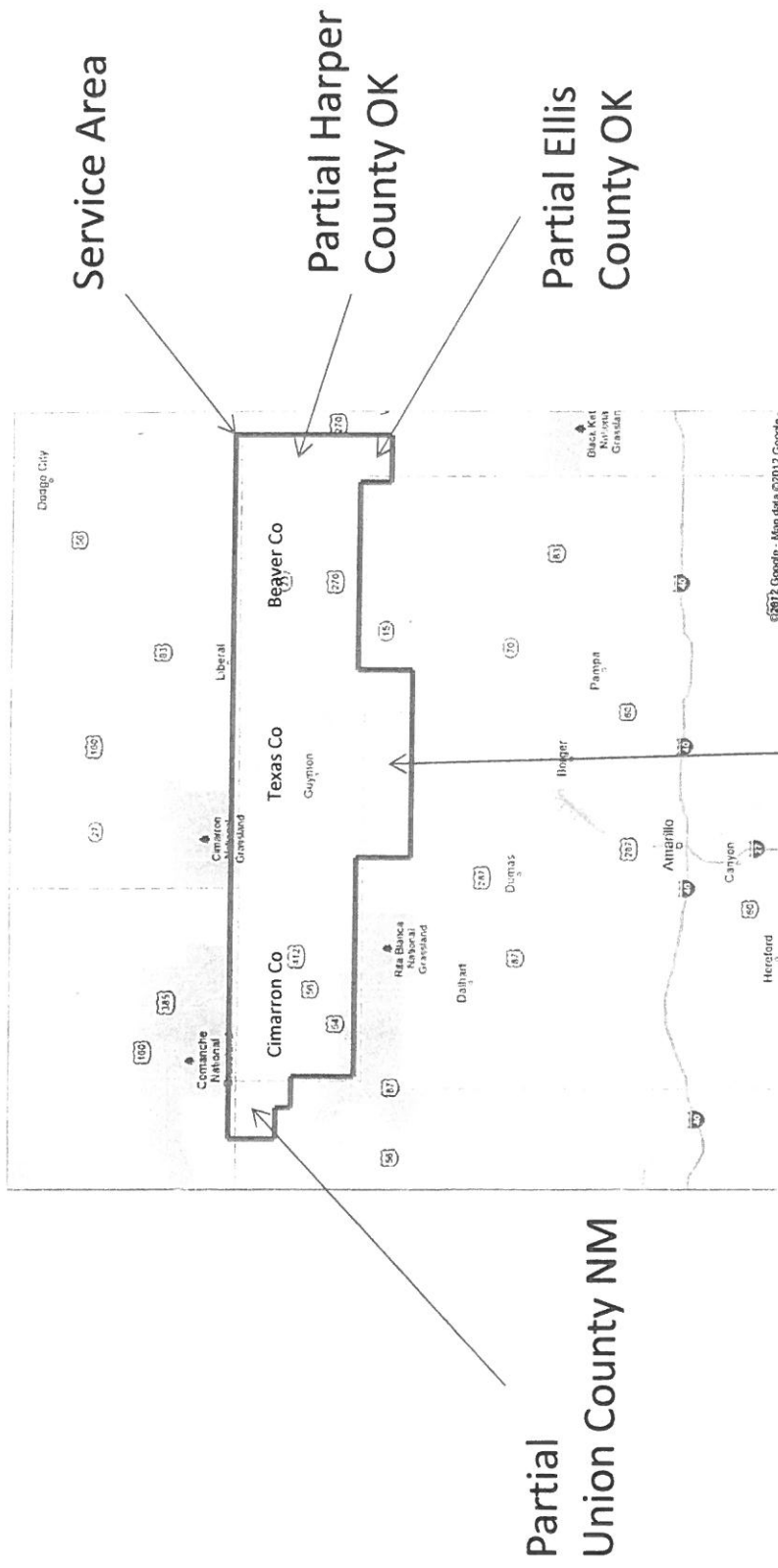
Signature \_\_\_\_\_

Title \_\_\_\_\_

Date \_\_\_\_\_

Google

Get Google Maps on your phone  
Text the word "GMAPS" to 466453



## Partial Sherman And Hansford Counties TX



## Panhandle Telephone Cooperative, Inc.

---

SHAWN HANSON  
Chief Executive Officer

November 9, 2015

Eddie Hamilton  
Governor  
Cheyenne and Arapaho Tribes  
Box 167  
Concho, OK 73022

Re: Federal Communications Commission mandate for Tribal Consultations

Dear Governor Hamilton:

As you may be aware, the FCC has issued a new rule requiring telecommunication service providers to engage with Tribal governments if the company provides service on Tribal lands. "Tribal lands" are defined as *"any federally recognized Indian Tribe's reservations, pueblo or colony, including former reservations in Oklahoma"*. On behalf of Panhandle Telephone Coop., Inc., we want to make sure that the communications needs of your Tribal members and all institutions operated by your Nation are met. In order to accomplish this, I would like to arrange a meeting with you or others you may designate to discuss needs and assessment and deployment planning for the communication needs of your Tribal members and Tribal government institutions. Panhandle Telephone Coop., Inc.'s service area consists of Cimarron, Texas and Beaver counties in the Oklahoma Panhandle, and a small portion of western Harper and far northeast Ellis counties. I am uncertain as to the Cheyenne and Arapaho Tribe's interest regarding our service area, and would like to confirm your desire to participate with us in this engagement process. To assist you in making this decision, I have attached a map of our service area. Should your area of interest include our service area, I would like to discuss, at a minimum, the following:

1. The communication needs of Tribal community anchor institutions
2. Feasibility and sustainability planning for your communication needs
3. Marketing of our services to Tribal members
4. Rights of way issues, if any, associated with our provisioning of services to Tribal members and/or institutions operated by the Nation
5. Our compliance with Tribal business and licensing requirements, if any
6. Other items you wish to discuss.

I would like to schedule a meeting at your earliest convenience. Please contact me at the below phone number or email address so we can select the time and location that best fits your schedule.



Alternatively, if you feel you have no Tribal interests in our service area, I've included a letter to that effect and a return envelope which you may use to communicate that decision to us. Or, if you prefer, you could choose to contact us via the contact information below:

Contact information:

Travis Clark

P. O. Box 1188

Guymon, OK 73942

Email: [travis.clark@ptci.net](mailto:travis.clark@ptci.net)

Phone: 580-468-2307

Mobile: 580-651-3880

Fax: 580-468-3799

Sincerely,

A handwritten signature in black ink that reads "Travis Clark". The signature is fluid and cursive, with the first name "Travis" being more prominent than the last name "Clark".

Travis Clark  
Plant Manager

TC:kb

cc: Shawn Hanson  
CEO  
Panhandle Telephone Coop., Inc.

Travis Clark  
Plant Manager  
PTCI  
Box 1188  
Guymon, OK 73942

Dear Mr. Clark:

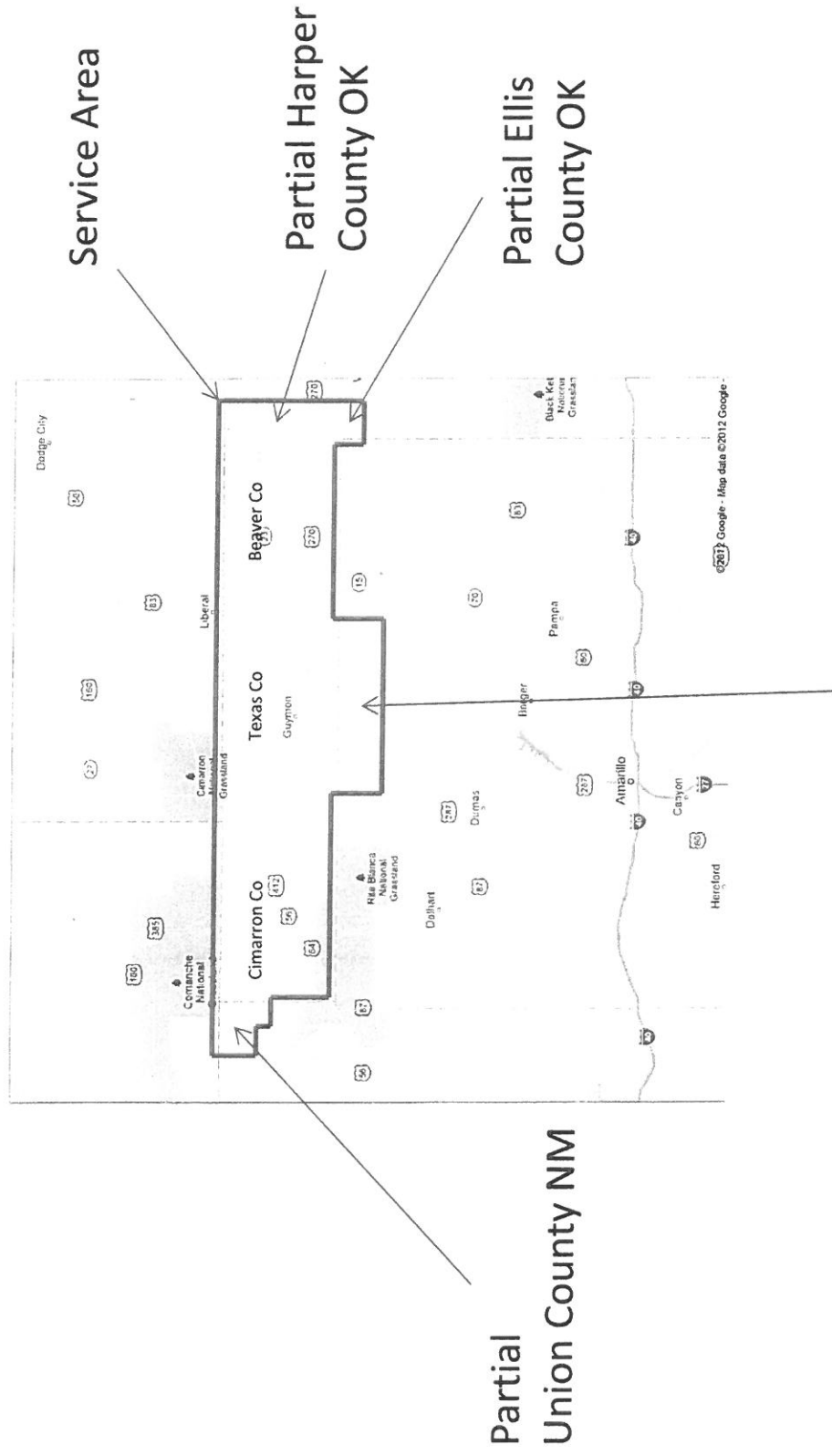
This document will serve to notify Panhandle Telephone Cooperative, Inc. that the Cheyenne – Arapaho Tribes have no Tribal interest in Panhandle's service area and as such, decline to engage in a discussion of our Tribal communication needs.

Signature \_\_\_\_\_

Title \_\_\_\_\_

Date \_\_\_\_\_

Google



Partial Sherman  
And Hansford Counties TX

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Mail permits.



1. Article Addressed to:

Amber Toppah, Chairman  
Kiowa Tribe of OKla  
Box 369  
Carnegie, OK 73105

2. Article Number

(Transfer from service label)

PS Form 3811, July 2013

Domestic Return Receipt

7015 0640 0006 7611 3953

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

X ☒ Agent ☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes ☒ No

If YES, enter delivery address below:

3. Service Type

☒ Certified Mail® ☐ Priority Mail Express™  
☐ Registered ☒ Return Receipt for Merchandise  
☐ Insured Mail ☐ Collect on Delivery

4. Restricted Delivery? (Extra Fee) ☐ Yes ☒ No

**U.S. Postal Service™  
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Domestic Mail Only

For delivery information, visit our website at [www.usps.com](http://www.usps.com).

CARNEGIE, OK 73105

Certified Mail Fee \$3.45

Extra Services & Fees (check box, add fee as applicable)

☐ Return Receipt (hardcopy) \$2.80

☐ Return Receipt (electronic) \$0.00

☐ Certified Mail Restricted Delivery \$0.00

☐ Adult Signature Required \$0.00

☐ Adult Signature Restricted Delivery \$0.00

Postage \$0.71

Total Postage and Fees \$6.96

Sent To Kiowa Tribe of Oklahoma

Street and Apt. No. or PO Box No.

Box 369

City, State, ZIP+4®

Carnegie, OK 73105

Postmark Here

11/10/2015

See Reverse for Instructions

PS Form 3800, April 2015 PSN 7530-02-000-9047

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address.



1. Article Addressed to:

Amber Toppah, Chairman  
Kiowa Tribe of OKla  
Box 369  
Carnegie, OK 73105

2. Article Number

Transfer from service label

PS Form 3814, July 2013

Domestic Return Receipt

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

X Agent

☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☒ Yes ☐ No

If YES, enter delivery address below:

3. Service Type

☒ Certified Mail® ☐ Priority Mail Express™

☐ Registered

☒ Return Receipt for Merchandise

☐ Insured Mail

☐ Collect on Delivery

4. Restricted Delivery? (Extra Fee) ☐ Yes ☐ No

0006 7611 3946

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CHANGING, UK 73105

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Extra Services & Fees (check box, add fee as appropriate)

☐ Return Receipt (hardcopy) \$2.80

☐ Return Receipt (electronic) \$0.00

☐ Certified Mail Restricted Delivery \$0.00

☐ Adult Signature Required \$0.00

☐ Adult Signature Restricted Delivery \$0.00

Postage \$0.71

Total Postage and Fees \$0.96

Sent To Kiowa Tribe of OKla

Street and Apt. No., PO Box No. Box 369

City, State, ZIP+4® Carnegie OK 73105

Postmark Here

11/10/2015

PS Form 3800, April 2015 PSN 7530-02-000-9047

See Reverse for Instructions

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.



1. Article Addressed to:

Eddie Hamilton  
Cheyenne & Arapaho  
Box 167  
Concho OK 73022

2. Article Number:

Transfer from service label

PS Form 3811 July 2013

Domestic Return Receipt

11/10/2015

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

*[Signature]* ☒ Agent ☐ Addressee

B. Received by (Printed Name)

*[Signature]* C. Date of Delivery 11/17/15

D. Is delivery address different from item 1? ☐ Yes ☐ No  
If YES, enter delivery address below:

3. Service Type

- ☒ Certified Mail® ☐ Priority Mail Express™  
☐ Registered ☒ Return Receipt for Merchandise  
☐ Insured Mail ☒ Collect on Delivery

4. Restricted Delivery? (Extra Fee) ☐ Yes ☐ No

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**OFFICIAL USE**

Certified Mail Fee	\$3.45	0437	06
Extra Services & Fees (check box, add fee as appropriate)	\$2.80		
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00		
<input type="checkbox"/> Return Receipt (electronic)	\$0.00		
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00		
<input type="checkbox"/> Adult Signature Required	\$0.00		
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00		
Postage	\$0.71		
Total Postage and Fees	\$8.96		

Postmark  
Here

11/10/2015

Sent To

*Cheyenne & Arapaho Tribes*

Street and Apt. No., Box No.

Box 167

City, State, ZIP+4®

Concho OK 73022

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is selected.

■ Priority

■ Attch

or C



1. Article Addressed to:

Eddie Hamilton  
Cheyenne & Arapaho Tribes  
Box 167  
Concho, OK 73022

2. Article Number

(Transfer from service label)

7015 0640 0006 7611 3939

PS Form 3811, July 2013

Domestic Return Receipt

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

*[Signature]* ☒ Agent ☐ Addressee

3. Received by (Printed Name)

*[Signature]* C. Date of Delivery *11/17/15*

D. Is delivery address different from item 1? ☐ Yes ☐ No  
If YES, enter delivery address below:

3. Service Type

☒ Certified Mail® ☐ Priority Mail Express™

☐ Registered ☒ Return Receipt for Merchandise

☐ Insured Mail ☐ Collect on Delivery

4. Restricted Delivery? (Extra Fee) ☐ Yes ☐ No

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CONCHO OK 73022

Certified Mail Fee \$3.45

Extra Services & Fees (check box, add fee amount)

☐ Return Receipt (hardcopy) \$2.80

☐ Return Receipt (electronic) \$0.00

☐ Certified Mail Restricted Delivery \$0.00

☐ Adult Signature Required \$0.00

☐ Adult Signature Restricted Delivery \$0.00

Postage \$0.71

Total Postage and Fees \$6.96

11/10/2015

Sent To

Cheyenne & Arapaho Tribes

Street and Apt. No., or PO Box No.

Box 167

City, State, ZIP+4® Concho OK 73022

PS Form 3800, April 2015 PSN 7530-02-000-9047

See Reverse for Instructions

666 792 9000 0490 5702

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Here

0437 06

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.

■ PS Form 3800, April 2015 PSN 7530-02-000-9047



1. Article Addressed to:

Tx Vicenti President  
Ticarilla Apache Nation  
Box 507  
Dulce, NM 87528

Article Number 1.2 INJST07 7015 0640  
(Transfer from service label)

PS Form 3811, July 2013 X1 071130

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature ☒ Agent  
☒ Addressee

B. Received by (Printed Name) C. Date of Delivery  
11/10/15

D. Is delivery address different from item 1? ☐ Yes  
If YES, enter delivery address below: ☐ No

3. Service Type  
☒ Certified Mail®  
☐ Registered  
☐ Insured Mail  
☐ Priority Mail Express™  
☒ Return Receipt for Merchandise  
☐ Collect on Delivery

4. Restricted Delivery? (Extra Fee) ☐ Yes

0006 7611 3922

Return Receipt

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Domestic Mail Only**

For delivery information, visit our website at [www.usps.com](http://www.usps.com).

DULCE, NM 87528

Certified Mail Fee	\$3.45
Extra Services & Fees (check box, add fee as appropriate)	
<input type="checkbox"/> Return Receipt (hardcopy)	\$2.80
<input type="checkbox"/> Return Receipt (electronic)	\$0.00
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00
<input type="checkbox"/> Adult Signature Required	\$0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00
Postage	\$0.71
Total Postage and Fees	\$6.96
Sent To	

11/10/2015

Street and Apt. No., or PO Box No.

City, State, Zip+4

PS Form 3800, April 2015 PSN 7530-02-000-9047

See Reverse for Instructions

226E 7792 9000 0490 5102

0437 06

Postmark Here



## SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.  
 ■ Print



## 1. Article Addressed to:

Ty Vicenti  
 Jicarilla Apache Nation  
 Box 507  
 Dulce, NM 87528

## 2. Article Number

(Transfer from service label)

7015 0640 0006 7611 4165

PS Form 3811, July 2013

Domestic Return Receipt

## COMPLETE THIS SECTION ON DELIVERY

## A. Signature

X

☐ Agent☐ Addressee

## B. Received by (Printed Name)

## C. Date of Delivery

## D. Is delivery address different from item 1?

☐ Yes

If YES, enter delivery address below:

☐ No

## 3. Service Type

☒ Certified Mail®☐ Priority Mail Express™☐ Registered☒ Return Receipt for Merchandise☐ Insured Mail☐ Collect on Delivery

## 4. Restricted Delivery? (Extra Fee)

☐ Yes

U.S. Postal Service™

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For delivery information, visit our website at [www.usps.com](http://www.usps.com)®.

DULCE, NM 87528

Certified Mail Fee \$3.45

Extra Services &amp; Fees (check box, add fee as appropriate)

☐ Return Receipt (hardcopy) \$0.00☐ Return Receipt (electronic) \$0.00☐ Certified Mail Restricted Delivery \$0.00☐ Adult Signature Required \$0.00☐ Adult Signature Restricted Delivery \$0.00

Postage \$0.49

Total Postage and Fees \$6.74

0437  
06Postmark  
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11/10/2015

Sent To

Street and Apt. No., or PO Box No.

City, State, ZIP+4®

Dulce, NM 87528

PS Form 3800, April 2015 PSN 7530-02-000-9047

See Reverse for Instructions

7015 0640 0006 7611 4165

## SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete



- Attach this card to the back of the envelope or on the front if space permits.

## 1. Article Addressed to:

Wallace Coffey  
Comanche Nation  
Box 908  
Lawton, OK 73502

## 2. Article Number

(Transfer from service label)

7015 0640 0006 7611 3878

PS Form 3811, July 2013

Domestic Return Receipt

## COMPLETE THIS SECTION ON DELIVERY

## A. Signature

X

☐ Agent☐ Addressee

## B. Received by (Printed Name)

## C. Date of Delivery

11-16-15

- D. Is delivery address different from item 1? ☐ Yes  
If YES, enter delivery address below: ☐ No

## 3. Service Type

- ☒ Certified Mail® ☐ Priority Mail Express™  
☐ Registered ☒ Return Receipt for Merchandise  
☐ Insured Mail ☐ Collect on Delivery

## 4. Restricted Delivery? (Extra Fee)

☐ Yes

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Extra Services &amp; Fees (check box, add fee as appropriate)

- ☐ Return Receipt (hardcopy) \$2.80  
☐ Return Receipt (electronic) \$0.00  
☐ Certified Mail Restricted Delivery \$0.00  
☐ Adult Signature Required \$0.00  
☐ Adult Signature Restricted Delivery \$0.00

Postage \$0.71

Total Postage and Fees \$6.96

0437  
06Postmark  
Here

11/10/2015

Sent To

Wallace Coffey

Street and Apt. No., or PO Box No.

Box 908

City, State, ZIP+4®

Lawton, OK 73502

PS Form 3800, April 2015 PSN 7530-02-000-9047

See Reverse for Instructions

7015 0640 0006 7611 3878

**SENDER: COMPLETE THIS SECTION**

Complete items 1, 2, and 3. Also complete



or on the front if space permits.

1. Article Addressed to:

Wallace Coffey  
Comanche Nation  
P.O. Box 908  
Lawton, OK 73502

2. Article Number (Transfer from service label)

ND5102 7029 0140 0006 7611 3885

PS Form 3800, MAY2015 PSN 7530-02-000-9047 Domestic Return Receipt

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature ☒ Agent ☐ Addressee

B. Received by (Printed Name) C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes ☐ No

If YES, enter delivery address below:

Service Type ☐ Certified Mail ☐ Registered Mail ☐ Insured Mail ☐ Priority Mail Express<sup>SM</sup> ☐ Return Receipt for Merchandise ☐ Collect on Delivery

4. Restricted Delivery? (Extra Fee) ☐ Yes ☐ No

U.S. Postal Service<sup>SM</sup>

CERTIFIED MAIL<sup>®</sup> RECEIPT

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For delivery information, visit our website at [www.usps.com](http://www.usps.com)

OFFICIAL USE

Certified Mail Fee \$3.45

Extra Services & Fees (check box, add fee as appropriate)

☐ Return Receipt (hardcopy) \$0.00

☐ Return Receipt (electronic) \$0.00

☐ Certified Mail Restricted Delivery \$0.00

☐ Adult Signature Required \$0.00

☐ Adult Signature Restricted Delivery \$0.00

Postage \$0.71

Total Postage and Fees \$6.96

Sent To Comanche Nation

Street and Apt. No., Box No. 908

City, State, ZIP+4<sup>®</sup> Lawton OK 73502

Postmark Here

11/10/2015

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

- Complete item  
■ Print so th  
■ Attach card to the back of the mailpiece, or on the front if space permits.



Signature

*George Wickliffe*

- ☐ Agent  
☐ Addressee

B. Received by (Print Name)

C. Date of Delivery

1. Article Addressed to:

*George Wickliffe*

*United Keetoowah Band of Cherokee*

*Box 746*

*Tahlequah, OK 74465*

2. Article Number

(Transfer from service label)

*7015 0640 0006 7611 4172*

PS Form 3811, July 2013

Domestic Return Receipt

COMPLETE THIS SECTION ON DELIVERY

Signature

*George Wickliffe*

- ☐ Agent  
☐ Addressee

B. Received by (Print Name)

C. Date of Delivery

D. Is delivery address different from item 1? If YES, enter delivery address below: ☐ Yes ☐ No

3. Service Type

- ☒ Certified Mail® ☐ Priority Mail Express™  
☐ Registered ☒ Return Receipt for Merchandise  
☐ Insured Mail ☐ Collect on Delivery

4. Restricted Delivery? (Extra Fee) ☐ Yes ☐ No

U.S. Postal Service™  
CERTIFIED MAIL® RECEIPT  
Domestic Mail Only

For delivery information, visit our website at [www.usps.com](http://www.usps.com)®.

TAHLEQUAH, OK 74465

Certified Mail Fee \$3.45

Extra Services & Fees (check box, add fee as appropriate)

- ☐ Return Receipt (hardcopy) \$2.80  
☐ Return Receipt (electronic) \$0.00  
☐ Certified Mail Restricted Delivery \$0.00  
☐ Adult Signature Required \$0.00  
☐ Adult Signature Restricted Delivery \$0.00

Postage \$0.49

Total Postage and Fees \$0.74

Sent To *United Keetoowah Band*

Street and Apt. No., or PO Box No. *Box 746*

City, State, ZIP+4® *Tahlequah, OK 74465*

Postmark Here

11/10/2015

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also, item 4 if Restricted Mailpiece.

■  Use mailpiece, if it space permits.

**1. Article Addressed to:**

George Wickliffe  
United Keetoowah Band of Cherokee  
Box 746  
Tahlequah, OK 74465

**2. Article Number**

(Transfer from service label)

PS Form 3811, July 2013

Domestic Return Receipt

7015 0640 0006 7611 3915

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature Indy Schirrel ☐ Agent  
UKB Acctg ☐ Addressee

B. Received by (Printed Name) Indy Schirrel C. Date of Delivery

D. Is delivery address different from item 1-2? ☐ Yes  
If YES, enter delivery address below: ☐ No



**3. Service Type**

☐ Certified Mail® ☐ Priority Mail Express™  
☐ Registered ☐ Return Receipt for Merchandise  
☐ Insured Mail ☐ Collect on Delivery

4. Restricted Delivery? (Extra Fee) ☐ Yes

**U.S. Postal Service™  
CERTIFIED MAIL® RECEIPT  
Domestic Mail Only**

For delivery information, visit our website at [www.usps.com](http://www.usps.com)®

TAHLEQUAH, OK 74465  
**OFFICIAL USE**

Certified Mail Fee \$3.45 \$2.80  
Extra Services & Fees (check box, add fee as appropriate)  
☐ Return Receipt (hardcopy) \$0.00  
☐ Return Receipt (electronic) \$0.00  
☐ Certified Mail Restricted Delivery \$0.00  
☐ Adult Signature Required \$0.00  
☐ Adult Signature Restricted Delivery \$0.00  
Postage \$0.49  
Total Postage and Fees \$6.74

Postmark  
Here

11/10/2015

Sent To United Keetoowah Band of Cherokee  
Street and Apt. No., or PO Box No. Box 746  
City, State, ZIP+4® Tahlequah, OK 74465

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

5766 1792 9000 0490 5702

## **LINE 1010 – VOICE SERVICES RATE COMPARABILITY**

The Wireline Competition Bureau's 2015 reasonable comparability benchmark for voice services was \$47.48, which includes the federal subscriber line charge ("SLC").<sup>1</sup>

In 2015, in all of the exchanges served by Panhandle Telephone Cooperative, Inc. ("the Cooperative"), the single-line residential local rate was \$17.50. When the federal SLC (\$6.50) is included, the total rate was \$24. Therefore, the Cooperative's pricing of fixed voice services in 2015 was less than the reasonable comparability benchmark of \$47.48.

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<sup>1</sup> *Wireline Competition Bureau Announces Results of 2015 Urban Rate Survey for Fixed Voice and Broadband Services and Posting of Survey Data and Explanatory Notes*, Public Notice, WC Docket No. 10-90, DA 15-470 (rel. April 16, 2015).

## **LINE 1030 – BROADBAND SERVICES RATE COMPARABILITY**

In 2015, Panhandle Telephone Cooperative, Inc. (“the Cooperative”) charged a residential rate of \$59.99 for broadband providing 12 Mbps download, 1 Mbps upload, and an unlimited usage allowance. This rate is lower than \$77.80, which is the 2015 reasonable comparability benchmark established by the Wireline Competition Bureau for 10 Mbps download, 1 Mbps upload, and an unlimited usage allowance<sup>1</sup> – a less robust service offering than the one provided by the Cooperative.

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<sup>1</sup> *Wireline Competition Bureau Announces Results of 2015 Urban Rate Survey for Fixed Voice and Broadband Services and Posting of Survey Data and Explanatory Notes*, Public Notice, WC Docket No. 10-90, DA 15-470 (rel. April 16, 2015).

## **LINE 1210 – TERMS & CONDITIONS OF VOICE TELEPHONY LIFELINE PLANS**

Residential customers of Panhandle Telephone Cooperative, Inc. (“the Cooperative”) residing in non-Tribal exchanges in Oklahoma who qualify for the Lifeline Program receive a discount of \$9.25 on local voice telephony service (\$9.25 federal discount + \$0 state discount<sup>1</sup>). Residential Lifeline customers residing in the Cooperative’s Tribal exchange in Oklahoma receive a discount of \$23.00 on local voice telephony service (\$9.25 federal discount + additional \$13.75 federal discount + \$0 state discount). Residential Lifeline customers residing in the Cooperative’s Texas exchanges receive a \$12.75 discount on local voice telephony service (\$9.25 federal discount + \$3.50 state discount).

In all of the Cooperative’s non-Tribal exchanges in Oklahoma, the Lifeline single-line residential rate, including the federal subscriber line charge (“SLC”), is \$14.75 (\$24.00 standard rate - \$9.25 discount). This rate applies to the following exchanges: Adams, Balko, Beaver, Boise City, Bryans Corner, Eva, Felt-Wheelless, Floris, Forgan, Gate, Goodwell, Griggs, Guymon, Hardesty, Hooker, Kenton, Keyes, Logan, Texhoma, Turpin, and Tyrone.

In the Cooperative’s Tribal exchange in Oklahoma – Laverne – the Lifeline single-line residential rate, including the federal SLC, is \$1.00 (\$24.00 standard rate - \$23.00 discount).

In the portion of the Cooperative’s exchanges that extend into Texas, the Lifeline single-line residential rate, including the federal SLC, is \$11.25 (\$24.00 standard rate - \$12.75 discount). This rate applies to the Texas portion of the following exchanges: Guymon, Hardesty, and Texhoma.

All single-line residential customers, including Lifeline customers, have an unlimited number of minutes for calls made within their local calling area.

Toll charges for calls outside of the local calling area are determined by the long distance carrier of the customer’s choosing. Customers may elect to subscribe to toll blocking at no charge.

The Cooperative does not disconnect the service of Lifeline subscribers for the non-payment of toll charges. However, the Cooperative reserves the right to implement toll blocking, at no charge, if the customer incurs a significant balance of unpaid toll bills.

Lifeline Program reductions do not apply to additional services such as information-related services and custom calling features. Lifeline customers may subscribe to these services, where available, at the same rates offered to other customers.

Additional information regarding the terms and conditions of voice telephony Lifeline plans can be found at <http://www.ptci.net/about/lifeline/>.

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<sup>1</sup> The state Lifeline discount in Oklahoma was eliminated in November, 2014.



## **LINE 3010 – MILESTONE CERTIFICATION**

Panhandle Telephone Cooperative, Inc. (“the Cooperative”) hereby certifies that the Cooperative has taken reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas, at rates that are reasonably comparable to rates for comparable offerings in urban areas, and that requests for such service are met within a reasonable amount of time. If the Cooperative determines that a request for broadband at actual speeds of at least 10 Mbps downstream/1 Mbps upstream is unreasonable, and offering broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream is reasonable, the Cooperative offers broadband service of at least 4 Mbps downstream/1 Mbps upstream.

According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0572-0031. The time required to complete this information collection is estimated to average 4 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.

<p>USDA-RUS</p>  <p><b>OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS</b></p>	<p><i>This data will be used by RUS to review your financial situation. Your response is required by 7 U.S.C. 901 et seq. and, subject to federal laws and regulations regarding confidential information, will be treated as confidential.</i></p> <p>BORROWER NAME</p> <p>Panhandle Telephone Cooperative, Inc.</p>	
<p><i>INSTRUCTIONS-Submit report to RUS within 30 days after close of the period. For detailed instructions, see RUS Bulletin 1744-2. Report in whole dollars only.</i></p>	<p>PERIOD ENDING December , 2015</p>	<p>BORROWER DESIGNATION OK0530</p>
<p style="text-align: center;"><b>CERTIFICATION</b></p> <p><i>We hereby certify that the entries in this report are in accordance with the accounts and other records of the system and reflect the status of the system to the best of our knowledge and belief.</i></p> <p><b>ALL INSURANCE REQUIRED BY 7 CFR PART 1788, CHAPTER XVII, RUS, WAS IN FORCE DURING THE REPORTING PERIOD AND RENEWALS HAVE BEEN OBTAINED FOR ALL POLICIES.</b></p> <p style="text-align: center;"><b>DURING THE PERIOD COVERED BY THIS REPORT PURSUANT TO PART 1788 OF 7CFR CHAPTER XVII</b> (Check one of the following)</p> <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <p><input checked="" type="checkbox"/> All of the obligations under the RUS loan documents have been fulfilled in all material respects.</p> </div> <div style="width: 45%;"> <p><input type="checkbox"/> There has been a default in the fulfillment of the obligations under the RUS loan documents. Said default(s) is/are specifically described in the Telecom Operating Report</p> </div> </div> <div style="display: flex; justify-content: space-between; margin-top: 20px;"> <div style="width: 30%;"> <p>_____ Shawn Hanson</p> </div> <div style="width: 30%;"> <p>_____ 2/11/2016</p> </div> <div style="width: 30%; text-align: center;"> <p>DATE</p> </div> </div>		

PART A. BALANCE SHEET					
ASSETS	BALANCE PRIOR YEAR	BALANCE END OF PERIOD	LIABILITIES AND STOCKHOLDERS' EQUITY	BALANCE PRIOR YEAR	BALANCE END OF PERIOD
<b>CURRENT ASSETS</b>			<b>CURRENT LIABILITIES</b>		
1. Cash and Equivalents			25. Accounts Payable		
2. Cash-RUS Construction Fund			26. Notes Payable		
3. Affiliates:			27. Advance Billings and Payments		
a. Telecom, Accounts Receivable			28. Customer Deposits		
b. Other Accounts Receivable			29. Current Mat. L/T Debt		
c. Notes Receivable			30. Current Mat. L/T Debt-Rur. Dev.		
4. Non-Affiliates:			31. Current Mat.-Capital Leases		
a. Telecom, Accounts Receivable			32. Income Taxes Accrued		
b. Other Accounts Receivable			33. Other Taxes Accrued		
c. Notes Receivable			34. Other Current Liabilities		
5. Interest and Dividends Receivable			<b>35. Total Current Liabilities (25 thru 34)</b>		
6. Material-Regulated			<b>LONG-TERM DEBT</b>		
7. Material-Nonregulated			36. Funded Debt-RUS Notes		
8. Prepayments			37. Funded Debt-RTB Notes		
9. Other Current Assets			38. Funded Debt-FFB Notes		
<b>10. Total Current Assets (1 Thru 9)</b>			39. Funded Debt-Other		
<b>NONCURRENT ASSETS</b>			40. Funded Debt-Rural Develop. Loan		
11. Investment in Affiliated Companies			41. Premium (Discount) on L/T Debt		
a. Rural Development			42. Reacquired Debt		
b. Nonrural Development			43. Obligations Under Capital Lease		
12. Other Investments			44. Adv. From Affiliated Companies		
a. Rural Development			45. Other Long-Term Debt		
b. Nonrural Development			<b>46. Total Long-Term Debt (36 thru 45)</b>		
13. Nonregulated Investments			<b>OTHER LIAB. &amp; DEF. CREDITS</b>		
14. Other Noncurrent Assets			47. Other Long-Term Liabilities		
15. Deferred Charges			48. Other Deferred Credits		
16. Jurisdictional Differences			49. Other Jurisdictional Differences		
<b>17. Total Noncurrent Assets (11 thru 16)</b>			50. Total Other Liabilities and Deferred Credits (47 thru 49)		
<b>PLANT, PROPERTY, AND EQUIPMENT</b>			<b>EQUITY</b>		
18. Telecom, Plant-in-Service			51. Cap. Stock Outstand. & Subscribed		
19. Property Held for Future Use			52. Additional Paid-in-Capital		
20. Plant Under Construction			53. Treasury Stock		
21. Plant Adj., Nonop. Plant & Goodwill			54. Membership and Cap. Certificates		
22. Less Accumulated Depreciation			55. Other Capital		
<b>23. Net Plant (18 thru 21 less 22)</b>			56. Patronage Capital Credits		
<b>24. TOTAL ASSETS (10+17+23)</b>			57. Retained Earnings or Margins		
			<b>58. Total Equity (51 thru 57)</b>		
			<b>59. TOTAL LIABILITIES AND EQUITY (35+46+50+58)</b>		

Total Equity =            % of Total Assets

USDA-RUS

**OPERATING REPORT FOR  
TELECOMMUNICATIONS BORROWERS**

BORROWER DESIGNATION

OK0530

PERIOD ENDING

December, 2015

INSTRUCTIONS- See RUS Bulletin 1744-2

**PART B. STATEMENTS OF INCOME AND RETAINED EARNINGS OR MARGINS**

ITEM	PRIOR YEAR	THIS YEAR
1. Local Network Services Revenues		
2. Network Access Services Revenues		
3. Long Distance Network Services Revenues		
4. Carrier Billing and Collection Revenues		
5. Miscellaneous Revenues		
6. Uncollectible Revenues		
<b>7. Net Operating Revenues (1 thru 5 less 6)</b>		
8. Plant Specific Operations Expense		
9. Plant Nonspecific Operations Expense (Excluding Depreciation & Amortization)		
10. Depreciation Expense		
11. Amortization Expense		
12. Customer Operations Expense		
13. Corporate Operations Expense		
<b>14. Total Operating Expenses (8 thru 13)</b>		
15. Operating Income or Margins (7 less 14)		
16. Other Operating Income and Expenses		
17. State and Local Taxes		
18. Federal Income Taxes		
19. Other Taxes		
<b>20. Total Operating Taxes (17+18+19)</b>		
21. Net Operating Income or Margins (15+16-20)		
22. Interest on Funded Debt		
23. Interest Expense - Capital Leases		
24. Other Interest Expense		
25. Allowance for Funds Used During Construction		
<b>26. Total Fixed Charges (22+23+24-25)</b>		
27. Nonoperating Net Income		
28. Extraordinary Items		
29. Jurisdictional Differences		
30. Nonregulated Net Income		
<b>31. Total Net Income or Margins (21+27+28+29+30-26)</b>		
32. Total Taxes Based on Income		
33. Retained Earnings or Margins Beginning-of-Year		
34. Miscellaneous Credits Year-to-Date		
35. Dividends Declared (Common)		
36. Dividends Declared (Preferred)		
37. Other Debits Year-to-Date		
38. Transfers to Patronage Capital		
<b>39. Retained Earnings or Margins End-of-Period [(31+33+34) - (35+36+37+38)]</b>		
40. Patronage Capital Beginning-of-Year		
41. Transfers to Patronage Capital		
42. Patronage Capital Credits Retired		
<b>43. Patronage Capital End-of-Year (40+41-42)</b>		
44. Annual Debt Service Payments		
45. Cash Ratio [(14+20-10-11) / 7]		
46. Operating Accrual Ratio [(14+20+26) / 7]		
47. TIER [(31+26) / 26]		
48. DSCR [(31+26+10+11) / 44]		

<p align="center">USDA-RUS</p> <p align="center"><b>OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS</b></p> <p align="center">INSTRUCTIONS - See RUS Bulletin 1744-2</p>						<p>BORROWER DESIGNATION OK0530</p> <p>PERIOD ENDED December, 2015</p>	
<p align="center"><b>Part C. SUBSCRIBER (ACCESS LINE), ROUTE MILE, &amp; HIGH SPEED DATA INFORMATION</b></p>							
	1. RATES		2. SUBSCRIBERS (ACCESS LINES)			3. ROUTE MILES	
EXCHANGE	B-1 (a)	R-1 (b)	BUSINESS (a)	RESIDENTIAL (b)	TOTAL (c)	TOTAL (including fiber) (a)	FIBER (b)
Adams, OK							
Balko, OK							
Beaver, OK							
Boise City, OK							
Bryans Corner, OK							
Eva, OK							
Felt, OK							
Floris, OK							
Forgan, OK							
Gate, OK							
Goodwell, OK							
Griggs, OK							
Guymon, OK							
Hardesty, OK							
Hooker, OK							
Kenton, OK							
Keyes, OK							
Laverne, OK							
Logan, OK							
Texhoma, OK							
Turpin, OK							
Tyrone, OK							
MobileWireless							
Route Mileage Outside Exchange Area							
Total							
No. Exchanges							

<p>USDA-RUS</p> <p><b>OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS</b></p> <p>INSTRUCTIONS - See RUS Bulletin 1744-2</p>						<p>BORROWER DESIGNATION</p> <p>OK0530</p> <p>PERIOD ENDED</p> <p>December, 2015</p>
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**Part C. SUBSCRIBER (ACCESS LINE), ROUTE MILE, & HIGH SPEED DATA INFORMATION**

**4. BROADBAND SERVICE**

Details on Least Expensive Broadband Service								
EXCHANGE	No. Access Lines with BB available (a)	No Of Broadband Subscribers (b)	Number Of Subscribers (c)	Advertised Download Rate (Kbps) (d)	Advertised Upload Rate (Kbps) (e)	Price Per Month (f)	Standalone/Pckg (f)	Type Of Technology (g)
Adams, OK							StandAlone	DSL
Balko, OK							StandAlone	DSL
Beaver, OK							StandAlone	DSL
Boise City, OK							StandAlone	DSL
Bryans Corner, OK							StandAlone	DSL
Eva, OK							StandAlone	DSL
Felt, OK							StandAlone	DSL
Floris, OK							StandAlone	DSL
Forgan, OK							StandAlone	DSL
Gate, OK							StandAlone	DSL
Goodwell, OK							StandAlone	DSL
Griggs, OK							StandAlone	DSL
Guymon, OK							StandAlone	DSL
Hardesty, OK							StandAlone	DSL
Hooker, OK							StandAlone	DSL
Kenton, OK							StandAlone	DSL
Keyes, OK							StandAlone	DSL
Laverne, OK							StandAlone	DSL
Logan, OK							StandAlone	DSL
Texhoma, OK							StandAlone	DSL
Turpin, OK							StandAlone	DSL
Tyrone, OK							StandAlone	DSL
Total								

USDA-RUS  <b>OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS</b>			REDACTED – FOR PUBLIC INSPECTION BORROWER DESIGNATION OK0530 PERIOD ENDING December, 2015		
INSTRUCTIONS- See RUS Bulletin 1744-2					
<b>PART D. SYSTEM DATA</b>					
1. No. Plant Employees	2. No. Other Employees	3. Square Miles Served	4. Access Lines per Square Mile	5. Subscribers per Route Mile	
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	
<b>PART E. TOLL DATA</b>					
1. Study Area ID Code(s)  a. 432016 b. _____ c. _____ d. _____ e. _____ f. _____ g. _____ h. _____ i. _____ j. _____		2. Types of Toll Settlements (Check one)  <div style="display: flex; justify-content: space-between;"> <div>             Interstate: <input type="checkbox"/> Average Schedule               Intrastate: <input type="checkbox"/> Average Schedule           </div> <div> <input checked="" type="checkbox"/> Cost Basis   <input checked="" type="checkbox"/> Cost Basis           </div> </div>			
<b>PART F. FUNDS INVESTED IN PLANT DURING YEAR</b>					
1. RUS, RTB, & FFB Loan Funds Expended					
2. Other Long-Term Loan Funds Expended					
3. Funds Expended Under RUS Interim Approval					
4. Other Short-Term Loan Funds Expended					
5. General Funds Expended (Other than Interim)					[REDACTED]
6. Salvaged Materials					[REDACTED]
7. Contribution in Aid to Construction					
8. Gross Additions to Telecom. Plant (1 thru 7)					[REDACTED]
<b>PART G. INVESTMENTS IN AFFILIATED COMPANIES</b>					
INVESTMENTS  (a)	CURRENT YEAR DATA		CUMULATIVE DATA		
	Investment This Year  (b)	Income/Loss This Year  (c)	Cumulative Investment To Date  (d)	Cumulative Income/Loss To Date  (e)	Current Balance  (f)
1. Investment in Affiliated Companies - Rural Development					
2. Investment in Affiliated Companies - Nonrural Development			[REDACTED]		[REDACTED]

<p>USDA-RUS</p> <p><b>OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS</b></p>	<p>BORROWER DESIGNATION</p> <p>OK0530</p>
	<p>PERIOD ENDING</p> <p>December, 2015</p>

**PART H. CURRENT DEPRECIATION RATES**

Are corporation's depreciation rates approved by the regulatory authority with jurisdiction over the provision of telephone services? (Check one)

☒

YES

☐

NO

EQUIPMENT CATEGORY	DEPRECIATION RATE
1. Land and support assets - Motor Vehicles	
2. Land and support assets - Aircraft	
3. Land and support assets - Special purpose vehicles	
4. Land and support assets - Garage and other work equipment	
5. Land and support assets - Buildings	
6. Land and support assets - Furniture and Office equipment	
7. Land and support assets - General purpose computers	
8. Central Office Switching - Digital	
9. Central Office Switching - Analog & Electro-mechanical	
10. Central Office Switching - Operator Systems	
11. Central Office Transmission - Radio Systems	
12. Central Office Transmission - Circuit equipment	
13. Information origination/termination - Station apparatus	
14. Information origination/termination - Customer premises wiring	
15. Information origination/termination - Large private branch exchanges	
16. Information origination/termination - Public telephone terminal equipment	
17. Information origination/termination - Other terminal equipment	
18. Cable and wire facilities - Poles	
19. Cable and wire facilities - Aerial cable - Metal	
20. Cable and wire facilities - Aerial cable - Fiber	
21. Cable and wire facilities - Underground cable - Metal	
22. Cable and wire facilities - Underground cable - Fiber	
23. Cable and wire facilities - Buried cable - Metal	
24. Cable and wire facilities - Buried cable - Fiber	
25. Cable and wire facilities - Conduit systems	
26. Cable and wire facilities - Other	

USDA-RUS  <b>OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS</b>		BORROWER DESIGNATION OK0530	
INSTRUCTIONS – See help in the online application.		PERIOD ENDED December, 2015	
<b>PART I – STATEMENT OF CASH FLOWS</b>			
1. Beginning Cash (Cash and Equivalents plus RUS Construction Fund)			
<b>CASH FLOWS FROM OPERATING ACTIVITIES</b>			
2. Net Income			
<i>Adjustments to Reconcile Net Income to Net Cash Provided by Operating Activities</i>			
3. Add: Depreciation			
4. Add: Amortization			
5. Other (Explain) n/a			
<i>Changes in Operating Assets and Liabilities</i>			
6. Decrease/(Increase) in Accounts Receivable			
7. Decrease/(Increase) in Materials and Inventory			
8. Decrease/(Increase) in Prepayments and Deferred Charges			
9. Decrease/(Increase) in Other Current Assets			
10. Increase/(Decrease) in Accounts Payable			
11. Increase/(Decrease) in Advance Billings & Payments			
12. Increase/(Decrease) in Other Current Liabilities			
13. Net Cash Provided/(Used) by Operations			
<b>CASH FLOWS FROM FINANCING ACTIVITIES</b>			
14. Decrease/(Increase) in Notes Receivable			
15. Increase/(Decrease) in Notes Payable			
16. Increase/(Decrease) in Customer Deposits			
17. Net Increase/(Decrease) in Long Term Debt (Including Current Maturities)			
18. Increase/(Decrease) in Other Liabilities & Deferred Credits			
19. Increase/(Decrease) in Capital Stock, Paid-in Capital, Membership and Capital Certificates & Other Capital			
20. Less: Payment of Dividends			
21. Less: Patronage Capital Credits Retired			
22. Other (Explain) Interest rec [REDACTED] Prior period patronage adj [REDACTED]			
23. Net Cash Provided/(Used) by Financing Activities			
<b>CASH FLOWS FROM INVESTING ACTIVITIES</b>			
24. Net Capital Expenditures (Property, Plant & Equipment)			
25. Other Long-Term Investments			
26. Other Noncurrent Assets & Jurisdictional Differences			
27. Other (Explain) adj depreciation reserves due to retirements			
28. Net Cash Provided/(Used) by Investing Activities			
29. Net Increase/(Decrease) in Cash			
30. Ending Cash			

Revision Date 2010



<p>USDA-RUS</p> <p><b>OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS</b></p>	<p>BORROWER DESIGNATION</p> <p>OK0530</p>
<p>INSTRUCTIONS - See RUS Bulletin 1744-2</p>	<p>PERIOD ENDED</p> <p>December, 2015</p>
<p><b>NOTES TO THE OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS</b></p>	
<p>Part A - Line 39 - Balance of Cushion of Credit Funds. In 2008, the cushion of credit account was funded with \$ [REDACTED] In 2011, an additional \$ [REDACTED] was deposited in the cushion of credit account. In 2013, an additional \$ [REDACTED] was deposited in the cushion of credit account. RDUP loan payments will be made from this account for the next few years.</p>	

<div>USDA-RUS</div> <div>OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS</div>	<div>BORROWER DESIGNATION</div> <div>OK0530</div>
<div>INSTRUCTIONS - See RUS Bulletin 1744-2</div>	<div>PERIOD ENDED</div> <div>December, 2015</div>
<div>CERTIFICATION LOAN DEFAULT NOTES TO THE OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS</div>	